
Introduction

9.1 The earlier chapters of this volume and other volumes of this Report identify a number of industries and businesses involved in the raising and slaughter of cattle, the production of meat and meat products, the production and use of bovine by-products, and the disposal of bovine remains. Apart from the physical processes involved in raising and slaughter, live animals, carcasses and by-products had to be transported and stored. Diseased animals were treated by farm workers and veterinarians. Meanwhile, animal tissues were studied in laboratories and schools, and ingredients were extracted for vaccines and medicines at manufacturing facilities.

9.2 A large number of people therefore came into contact with cattle carcasses or tissues in the day-to-day course of their work. Even before the emergence of BSE, this could present health and safety dangers to people at work and others who might be affected by the activities of those at work.

9.3 This chapter describes the legislative and regulatory framework that operated between 1986 and 1996 in respect of health and safety issues and risks generally. This was the background against which any measures specific to possible risks from BSE had to be considered, a topic considered in Chapter 8 of vol. 6: Human Health, 1989–96.

Health and Safety at Work Etc Act 1974

Introduction

9.4 In 1986, the basic health and safety regulatory framework was contained in the Health and Safety at Work Etc Act 1974 and in Regulations made and Codes of Practice approved under it. The Act was intended:

   i. to make further provision for securing the health, safety and welfare of persons at work;
   ii. to protect others against risks to health or safety in connection with the activities of persons at work;
   iii. to control the keeping and use and prevent the unlawful acquisition, possession and use of dangerous substances; and
iv. for certain other purposes.\textsuperscript{629}

It applied to Great Britain – ie, to England, Wales and Scotland – but not to Northern Ireland, where the equivalent measure, the Health and Safety at Work Order (Northern Ireland) 1978, was broadly similar to the 1974 Act.

9.5 Part I of the Act, the relevant part so far as the Inquiry is concerned: \textsuperscript{630}

i. stated the general duties of employers, employees, self employed persons, those in control of non-domestic premises and manufacturers, importers and suppliers of articles for use at work; \textsuperscript{631}

ii. created a Health and Safety Commission (HSC) and a Health and Safety Executive (HSE); \textsuperscript{632}

iii. stated the procedure for making Regulations and approving Codes of Practice; \textsuperscript{633} and

iv. provided for enforcement of the requirements of the Act. \textsuperscript{634}

**Duties under the 1974 Act**

**Duty of employers to their employees**

9.6 Under the 1974 Act, it was the general duty of every employer to ensure, so far as was reasonably practicable, \textsuperscript{635} the health, safety and welfare at work of all his employees. \textsuperscript{636} In particular, so far as was reasonably practicable, the employer had to provide a safe system of work; make arrangements for ensuring safety and absence of risk to health connected with the use, handling, storage and transport of articles and substances; provide information, instruction, training and supervision necessary to ensure health and safety at work; provide safe access to and from the workplace; and provide a working environment that was safe, without risk to health, and adequate as regards facilities and arrangements for welfare at work. \textsuperscript{637}

**General duties of employees at work and others**

9.7 Every employee, while at work, had to take reasonable care for the health and safety of himself and others who might be affected by his acts or omissions at work. An employee also had to cooperate with his employer, or any other person who had a duty under the Act, to enable that duty to be performed or complied with. \textsuperscript{638}

\textsuperscript{629} L19 tab 2 p. 798 – preamble. The other purposes were: controlling certain emissions into the atmosphere, further provision for the Employment Medical Advisory Service, amending the law relating to building regulations, etc

\textsuperscript{630} Part II related to the functions and responsibility of the Employment Medical Advisory Service (EMAS) which was concerned with safeguarding the health of employed persons. Part III related to the Building Regulations and Amendment of Building (Scotland) Act 1959. Part IV was a miscellaneous section which, among other matters, dealt with interpretation of the Act and its extent and application

\textsuperscript{631} L19 tab 2 sections 2–7

\textsuperscript{632} L19 tab 2 sections 10–14

\textsuperscript{633} L19 tab 2 sections 15–16

\textsuperscript{634} L19 tab 2 sections 18–26

\textsuperscript{635} This is a narrower term than ‘physically possible’ and involves a weighing of the risk against the measures necessary to eliminate the risk – see L19 tab 2 – notes to section 2.

\textsuperscript{636} L19 tab 2 section 2(1)

\textsuperscript{637} L19 tab 2 section 2(2)

\textsuperscript{638} L19 tab 2 section 7
Duties of employers and the self-employed to persons other than their employees

9.8 Every employer and every self-employed person had to ensure, so far as was reasonably practicable, that persons not in their employment, but who might be affected by their undertakings, were not exposed to health and safety risks.639

General duties of persons concerned with premises to persons other than their employees

9.9 Each person who had control of non-domestic premises had to ensure, so far as was reasonably practicable, the health and safety of persons who were not his employees, but to whom the premises had been made available.640

Duties of manufacturers, importers and suppliers

9.10 Manufacturers, importers and suppliers of any article for use at work had to ensure, so far as was reasonably practicable, that it was designed and constructed to be safe and without risks to health for use by persons at work, that it was adequately tested, and that appropriate and up-to-date information was available to users.641

Regulations and Codes of Practice

9.11 The 1974 Act provided for the making of health and safety Regulations and the approval and issuing of Codes of Practice.642 Regulations could repeal or modify specified ‘existing statutory provisions’ relating to hazardous processes or materials.643 The Secretary of State644 and the Minister of Agriculture, Fisheries and Food (or both acting jointly) could make Regulations for the general purposes of Part I.645 They could give effect to proposals for Regulations made by the HSC or independently of this, subject to consultation with the HSC and any other appropriate bodies.646

9.12 Of particular relevance to the Inquiry are the Control of Substances Hazardous to Health Regulations 1988 (COSHH).647 These came into force on 1 October 1989, and imposed duties on employers to protect employees and other persons who might be exposed to substances hazardous to health.648 Employers were required not to carry on any work that was liable to expose an employee to such substances unless they had made a ‘suitable and sufficient’ assessment of the risks to health and of what needed to be done to meet the requirements of the Regulations; this assessment was to be kept under review and revised if appropriate. Employers were also required to:

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639 L19 tab 2 section 3
640 L19 tab 2 section 4
641 L19 tab 2 section 6
642 L19 tab 2 section 1(2)
643 Listed in schedule 1
644 The Secretary of State for Employment from 1974 until July 1995, when responsibility passed to the Secretary of State for the Environment (since June 1997, for the Environment, Transport and the Regions)
645 L19 tab 2 section 15
646 L19 tab 2 section 50(1)
647 L19 tab 10
648 Defined as (a) those listed as dangerous to supply and which were for the purposes of risk specified as very toxic, toxic, harmful, corrosive, or irritant; (b) those for which a maximum exposure limit was specified or for which an occupational exposure standard had been approved by the HSC; (c) a micro-organism which created a hazard to the health of any person; (d) dust of any kind present in substantial concentration in air; (e) any other substance that created a hazard to the health of any person comparable to those created by the above-mentioned substances
i. prevent or, where this was not reasonably practicable, adequately control exposure to substances hazardous to health;\textsuperscript{649}

ii. ensure that any control measures, personal protective equipment, etc they provided were properly used or applied;

iii. maintain, examine and test control measures so that they were in an efficient state and working order and in good repair;

iv. where requisite, ensure that the exposure of their employees to substances hazardous to health was monitored;\textsuperscript{650}

v. ensure that their employees were under suitable health surveillance, including the maintenance of health records and employee access to them and regular examination by an employment medical adviser or appointed doctor; and

vi. provide suitable information, instruction and training.\textsuperscript{651}

9.13 Employees were required to ‘make full and proper use’ of any control measures, personal protective equipment, etc that were provided and to report immediately to the employer any defect in them.\textsuperscript{652}

9.14 The 1988 Regulations were re-enacted with modifications by the COSHH Regulations 1994.\textsuperscript{653} Among other things, these implemented European Council Directive 90/679/EEC on the control of risks from exposure to biological agents at work. In the definition of ‘substances hazardous to health’, the term ‘micro-organism’ was replaced by ‘biological agent’, which was defined as ‘any micro-organism, cell culture or human endoparasite, including any which have been genetically modified, which may cause any infection, allergy, toxicity or otherwise create a hazard to human health’.\textsuperscript{654}

9.15 Apart from extending the requirements in respect of risk assessments and adequate control measures to cover work activities that might involve exposure to biological agents, the 1994 Regulations added specific control measures and other requirements in respect of intentional work with biological agents in laboratories or animal rooms.\textsuperscript{655} Schedule 9 provided that the Health and Safety Commission should publish a document categorising biological agents according to hazard and the level of containment needed when working with them in laboratories. This reflected the categorisation used in recent European legislation.

\textsuperscript{649} ‘So far as is reasonably practicable’, without recourse to the provision of personal protective equipment
\textsuperscript{650} In certain specified cases, at the frequency specified in schedule 4 of the Regulations
\textsuperscript{651} Regulations 7–12
\textsuperscript{652} Regulation 8(2)
\textsuperscript{653} L19 tab 14
\textsuperscript{654} L19 tab 14 Regulation 2(1)
\textsuperscript{655} DO01 tab 11 p. 2 para. 8
The Health and Safety Commission (HSC) and the Health and Safety Executive (HSE)

**Introduction**

9.16 Oversight and enforcement of the requirements of the Act was the responsibility of the HSC and the HSE. The HSC was responsible for making such arrangements as it considered appropriate for the general purposes of the Act. The HSE was responsible for making adequate arrangements for enforcing the provisions of the Act, unless some other authority had been made responsible for such enforcement. This included giving effect to directions given by the Secretary of State to the HSC. But the HSC could not give HSE any directions as to how to enforce any of the relevant statutory provisions in a particular case.

**The Health and Safety Commission**

**General description**

9.17 The HSC consisted of a Chairman appointed by the Secretary of State, and up to nine other members appointed by the Secretary of State after consultation with organisations representing employers, employees, local authorities, and other organisations, including professional bodies, with an interest in health and safety issues. The Secretary of State was also responsible for approving, with or without modifications, any proposals for Regulations submitted to him by the HSC, and for giving directions to the Commission as he thought fit in respect of its functions.

9.18 It was the duty of the HSC to:

i. assist and encourage persons concerned with matters relevant to any of the general purposes of Part I of the Act;

ii. make such arrangements as it considered appropriate for the carrying out of research, the publication of the results of research, and the provision of training and information in that connection by others;

iii. make such arrangements as it considered appropriate for securing that government departments, employers, employees, organisations representing employers and employees respectively, and other persons concerned with matters relevant to any of those purposes, were provided with an information and advisory service and were kept informed of, and adequately advised on, such matters; and

iv. submit from time to time to Ministers such proposals as it considered appropriate for the making of Regulations.
9.19 The HSC could also:

i. make agreements with other government departments or people for those departments or people to perform on its or the HSE’s behalf any of its or the HSE’s functions;

ii. make agreements with any Minister, government department or public authority to perform on their behalf any of their functions that the Secretary of State considered it could perform appropriately in connection with its functions;\textsuperscript{664}

iii. appoint persons or committees of persons to provide it with advice in connection with any of its functions; and

iv. carry out or commission research into anything connected with its functions.\textsuperscript{665}

9.20 The Commission could also approve, and itself issue, Codes of Practice for the purpose of providing practical guidance in respect of duties under the Act, or health and safety Regulations, or existing statutory provisions. However, before doing so, it had to consult the appropriate government department or other body, and obtain the Secretary of State’s consent.\textsuperscript{666}

**HSC Advisory committees**

9.21 As noted above, the HSC had the power to appoint advisory committees. It made substantial use of such committees, the main function of which was to recommend standards and guidance, and sometimes to comment on policy issues confronting the HSC or to recommend an approach to a new problem.\textsuperscript{667} The advisory committees could also encourage the joint participation of all representative organisations in the improvement of health and safety at work, and give the problems of particular industries closer and more detailed attention than the Commission was itself able to do.\textsuperscript{668} Their membership reflected the representational nature of HSC; each included employer and employee representatives and, where appropriate, technological and professional experts.\textsuperscript{669}

9.22 The Committees were of two kinds: those dealing with specific industries, and those dealing with specific subjects. In 1994/95, there were:

- seven *Subject* advisory committees, concerned with particular types of hazards: dangerous pathogens, dangerous substances, genetic modification, ionising radiations, occupational health, safety of nuclear installations, and toxic substances.\textsuperscript{670} The most relevant to the BSE story was the Advisory Committee on Dangerous Pathogens (ACDP); and

- thirteen *Industry* advisory committees which looked across the board at safety in their sectors.\textsuperscript{671} Those of most relevance to the BSE story were the

\textsuperscript{664} But this did not include making Regulations of other legislative instruments

\textsuperscript{665} L19 tab 2 section 13(1)

\textsuperscript{666} L19 tab 2 section 16

\textsuperscript{667} The Scientific Advisory System: Memorandum to the Science and Technology Committee (Health and Safety Executive 1998) (DO01 tab 22) p. 3 para. 1.3.3

\textsuperscript{668} Health and Safety Commission Annual Report 1994/1995 (M68C tab 1) p.147

\textsuperscript{669} DO01 tab 22 p. 3 para. 1.3.4

\textsuperscript{670} Health and Safety Commission Annual Report 1994/1995 (M68C tab 1) p. 147

Health Services Advisory Committee (HSAC) and the Agricultural Industry Advisory Committee (AIAC).

9.23 The Advisory Committee on Dangerous Pathogens (ACDP) was set up by the HSC and DH in 1981 to provide advice on exposure to dangerous pathogens. It had an independent chairman and a dual HSE/DH secretariat, and advised and reported to the HSE, the HSC, and Health and Agriculture Ministers. It advised

...on general standards of safe working in laboratories handling dangerous pathogens; new hazards involving pathogens; control measures; categorisation of pathogens according to hazard; and research on pathogens.

Its terms of reference were widened in October 1991:

To advise the Health and Safety Commission, the Health and Safety Executive and Health and Agriculture Ministers, as required, on all aspects of hazards and risks to workers and others from exposure to pathogens.

and its membership was reconstituted so that it consisted of:

...8 ‘expert members’ (whose names are selected from suggestions solicited from a range of professional associations), 4 representatives of employers and 4 of employees... (In the past there were 10 plus 6 plus 6 members respectively.) This arrangement upholds the standard tripartite structure of all HSC advisory committees.

9.24 In 1984, the ACDP produced a document categorising pathogens into four Hazard Groups and setting out appropriate levels of containment for laboratory work with them. The Groups are defined in chapter 8 of vol. 6: *Human Health, 1989–96*.

9.25 The terms of reference of the Health Services Advisory Committee (HSAC) were to advise HSC on:

i. the protection of people at work from hazards to health and safety arising from their occupation within the health services, including dental services, general practice and the professions supplementary to medicine, but excluding occupational health services in other areas of employment;

ii. the protection of the public, with the exception of patients undergoing treatment, from related hazards arising from such activities;

iii. other associated matters referred to the Committee by the Commission or the Health and Safety Executive.

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672 The ACDP was set up as a result of developments over a number of years. In 1975, a Working Party on the Laboratory Use of Dangerous Pathogens (M11D tab 12) recommended that a Code of Practice should be drawn up for pathogens that should be handled in laboratories only under the control of suitable qualified staff (‘Category B pathogens’). This Code was published in 1978 (M11D tab 13). DH set up the Dangerous Pathogens Advisory Group to keep it up to date. Its terms of reference were ‘To consider whether there are organisms capable of causing communicable diseases that require measures to be taken in laboratories or elsewhere additional to those now recommended, in order to prevent infection in man or in animals and to make recommendations as to the measures required’. The DPAG subsequently became the ACDP


674 YB91/10.30/4.2–4.4
9.26 The Committee originally consisted of 26 members (later 23) appointed by the Commission following consultation with English health authorities, the CBI, Welsh and Scottish health authorities, and the TUC.675

9.27 The terms of reference of the Agricultural Industry Advisory Committee (AIAC) were:

i. to advise the Commission on the protection of people at work from hazards to health and safety arising from their occupation within agriculture and related industries and the protection of the public from related hazards arising from such activities; and other associated matters referred to the Committee by the Commission or the Health and Safety Executive;

ii. on behalf of the Commission, to encourage the joint participation of representative organisations in the protection of people from hazards to health and safety arising from agriculture and related industries;

iii. to provide advice and guidance to agriculture and related industries in whichever form best fitted the purpose;

iv. to act as a stimulus for identifying and meeting research needs in agriculture and related industries;

v. to report and submit plans of work to the Commission every three years or as required by the Commission.

9.28 The Committee consisted of 12 members appointed by HSC following consultation with the CBI and the TUC, and observers from the CBI, the TUC, agriculture departments (the Scottish Office Agriculture and Fisheries Department and MAFF), and the agriculture education world.676

The Health and Safety Executive (HSE)

Introduction

9.29 The HSE was a statutory body comprising a Director and two other members, appointed by the HSC with the approval of the Secretary of State,677 and supported by more than 4,000 staff. The role of the HSE was to enforce the Health and Safety at Work Etc Act 1974 and related legislation including Regulations, and to undertake tasks delegated to it by the HSC. Its main functions were:

i. advising and assisting HSC on health and safety policy, defining standards of health and safety, and proposing any necessary changes to the law;

ii. inspecting workplaces to secure compliance;

iii. investigating accidents, cases of ill-health and complaint;

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675 Information from the Health and Safety Executive (2 August 2000) (DO01 tab 23) p. 2
676 Information from the Health and Safety Executive (2 August 2000) (DO01 tab 23) p. 2
677 L19 tab 2 section 10(5). The members were appointed after consultation with the Director
iv. taking formal enforcement action (which could involve issuing statutory improvement or prohibition notices or prosecuting duty holders where necessary);

v. providing advice and information to employers, workers and the public;

vi. licensing and approving standards and arrangements in areas of significant hazard; and

vii. commissioning and carrying out research for HSC. 678

HSE’s Medical Division

9.30 The Medical Division consisted of a field force, the Employment Medical Advisory Service (EMAS), and specialist scientific and medical staff. It provided expert advice on all aspects of occupational health. Its staff worked with HSE inspectors on field investigations, and participated in policy initiatives such as the production of guidance by other HSE divisions. The field service provided expert advice at workplaces, and was involved in (amongst other things) ensuring health supervision of workers in jobs where they might be exposed to hazards, and in planning and mounting studies to evaluate particular risks. 679 It had three main functions:

i. to monitor health hazards and medical problems in all areas of industry;

ii. to advise all interested persons and organisations on precautions and environmental controls required to minimise health risk in employment; and

iii. to examine factory workers and young persons at work as necessary.

It also included an Epidemiological and Medical Statistics Unit, the centre for expertise on all aspects of epidemiology for the HSE. 680 The Medical Advisers of Medical Division had powers similar to those of factory inspectors, which are described later in this chapter.

Technical, Scientific and Medical Group (TSMG)

9.31 The Technical, Scientific and Medical Group (TSMG) was set up in 1986, combining the three divisions that formed the HSE’s Technology arm. Its role was to ‘promote and supply excellence in the technical advice given to the other parts of HSE and government on matters of industrial safety and health’, and it advised on the ‘nature and the extent of the risks involved, their effects on individuals, and on appropriate technical standards in light of what is technically achievable’. The TSMG was involved with the inspection of premises where there were special hazards such as explosives and dangerous pathogens. 681

678 Inquiry into BSE: Information from the Health and Safety Executive (March 1998) (DO01 tab 11) Appendix 1 para. 8
679 M68 tab 1 p. 24 Health and Safety Executive Annual Report 1986/87
680 M68 tab 1 p. 25
681 M68 tab 1 p. 9
Northern Ireland

9.32 In Northern Ireland, there was a Health and Safety Agency – roughly corresponding to the HSC but without its policy-making powers – and an Employment Medical Advisory Service.\(^{682}\)

National Interest Groups

9.33 National Interest Groups (NIGs) were tripartite bodies providing a link between HSE and employer and employee representatives in particular industry sectors for the purpose of agreeing practical health and safety standards.\(^{683}\) Their functions were to

\[\ldots\] gather and disseminate information, identify issues, encourage development of solutions to problems, formulate guidance and training material and promote uniformity of enforcement standards.'\(^{684}\)

Originally, their structure reflected the major employment sectors and HSE’s responsibilities. In 1987, following a review, it was decided to merge the industry responsibilities of individual NIGs and allocate new responsibilities.\(^{685}\)

9.34 The NIGs relevant to the BSE story were the Food NIG and the Livestock and Stationary Machinery NIG. The Food NIG worked with the Factory Inspectorate, and had an operational policy role within the food industry sector. This included creating or contributing to policy and liaising with industry, unions and associations. Its functions included obtaining agreement to standards and identifying strategies to promote health and safety in the industry. Its approach was to seek the agreement or consensus of industry and to achieve practical solutions rather than to impose solutions, as this was considered to be a more effective way of promoting health and safety and securing compliance.\(^{686}\)

9.35 The Livestock and Stationary Machinery NIG (later the Agricultural NIG) was set up in 1989 as part of the Factory and Agriculture Inspectorate Division (FAID) in HSE. It was responsible for advising HSE staff and the agriculture industry on matters within its remit.\(^{687}\)

Enforcement of the 1974 Act

Inspectors and their powers

9.36 Enforcement was the responsibility of the relevant ‘enforcement authority’; ie, the HSE, unless Regulations made by the Secretary of State had given a local authority responsibility for enforcing certain provisions or there was an agreement that another governmental department or public authority should do so.

\(^{682}\) Britain 1999: The Official Yearbook of the United Kingdom (The Stationery Office, 1998)
\(^{683}\) Inquiry into BSE: Information from the Health and Safety Executive (DO01 tab 11) p. 10 para. 21
\(^{684}\) M68 tab 1 p 21
\(^{685}\) M68 tab 2 p 51
\(^{686}\) S531 North para. 4
\(^{687}\) Information from the Health and Safety Executive (2 August 2000) (DO01 tab 23) p. 3
9.37 An enforcement authority could appoint suitably qualified inspectors to carry out enforcement duties.\textsuperscript{688} Such inspectors had powers to enter premises, to examine and investigate as appropriate, to take measurements and photographs and make recordings, and to take samples of articles and substances. They could also seize and render harmless (by destroying or otherwise) any article or substance which they considered was a cause of imminent danger, found in any premises.\textsuperscript{689}

9.38 If an inspector considered that a person was contravening a relevant statutory provision or had done so and was likely to continue or repeat the contravention, he could serve an ‘improvement notice’ directing that such action be remedied within a specified time.\textsuperscript{690} If an inspector considered that an activity involved or would involve a risk of serious personal injury, he could serve a ‘prohibition notice’ directing that the activity should not be carried on unless matters were remedied.\textsuperscript{691} A person served with an ‘improvement’ or a ‘prohibition’ notice had a right of appeal to an industrial tribunal.\textsuperscript{692} It was an offence to contravene any requirement or prohibition imposed by an improvement or a prohibition notice.\textsuperscript{693}

9.39 More generally, a failure by any relevant person to discharge any general duty created by the Act or any Regulation made under it was an offence.\textsuperscript{694} A failure to observe an approved Code of Practice did not in itself give rise to liability, but evidence of contravening the Code of Practice could be used in criminal proceedings relating to a failure to discharge any general duty created by the Act.\textsuperscript{695}

9.40 HSE inspectors aimed to persuade employers to comply with the requirements of the Act through planned programmes of prevention inspection (as opposed to visits made in response to accidents, complaints or enquiries). The Inspectorates’ resources were concentrated on workplaces and activities with higher than average risks.\textsuperscript{696}

**Inspectorates**

9.41 In 1986, HSE had inspectorates for factories, agriculture, mines and quarries, explosives, and nuclear installations. Of these, the Factories and Agricultural Inspectorate was relevant to the BSE story. Its function was to enforce safety in:

i. agriculture, forestry and allied industries;\textsuperscript{697}

ii. the manufacturing and services industries.

At that time, there were 160 agricultural inspectors, of whom 151 were in the field force. This was organised into 30 Groups, managed by Area Directors who were responsible for enforcement in more than 300,000 premises.\textsuperscript{698} The Factory Inspectorate also managed the HSE area organisation, with 20 area offices, on behalf of the Executive. More than 400,000 workplaces were on its register. It had

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\textsuperscript{688} L19 tab 2 section 19  
\textsuperscript{689} L19 tab 2 section 25  
\textsuperscript{690} L19 tab 2 section 21  
\textsuperscript{691} L19 tab 2 section 22  
\textsuperscript{692} L19 tab 2 section 24  
\textsuperscript{693} L19 tab 2 section 33(1)g  
\textsuperscript{694} L19 tab 2 section 33(1)(a)  
\textsuperscript{695} L19 tab 2 section 17  
\textsuperscript{696} M68 tab 2 p 45  
\textsuperscript{697} M68 tab 1 p 17  
\textsuperscript{698} M68 tab 1 p 17
some 560 inspectors and was endeavouring to recruit more, but found it impossible to attract sufficient numbers to balance losses from resignations and retirements.  

**Enforcement in Northern Ireland**

9.42 The Health and Safety at Work Order (Northern Ireland) 1978 was enforced mainly by the Northern Ireland Departments of Economic Development and of Agriculture through a health and safety inspectorate. District councils in Northern Ireland had an enforcement role similar to that of local authorities in Great Britain.