Astute Machinery Consultants

Provision and Use of Work Equipment Regulations Assessment Report

for the

Site Wide PUWER

Vent Seal 2

on behalf of

Ross Bradley | Rayovac Energizer | Washington

Proposal Number: 26067
Date: 03 Jun 2026

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Client:

Rayovac Energizer
2 Stephenson Road
Washington
NE37 3HW

AMC Consultant:

Steve Coleman

Date of Assessment:

07 Sept 2026

Revision History:

Initial Draft:	Steve Coleman	**Date:**	02 Sept 2026
Reviewed By:	Alastair Laurenson	**Date:**	24 Sept 2026
Issued to Customer:	Alastair Laurenson	**Date:**	30 Sept 2026

Project Details:

Project Name:	Site Wide PUWER

Machine Details:

Machine Name:	Vent Seal 2
Equipment Type:	Vent Seal Machine
Manufacturer:	No manufacturer infomation
Year of Manufacture:	No machine nameplate
Asset ID:	RAY0047
Serial Number:	No serial number found on the machine
Area:	Cell Assembly
Location:	Cell Assembly
Supply Voltage:	415 VAC
Control Voltage:	24 VDC
Pneumatic Pressure:	6 bar

Machine Basic Description:

The vent seal is manufactured from several components. The components are fitted together by the machine. The vent seal is used to regulate internal pressure while blocking external moisture, dust and contaminates from entering the cell.

Machine Certification:

The machine does not have a nameplate and does not have a CE Mark. The Declaration of Conformity has not been seen.

Scope of the Regulations:

The Provision and Use of Work Equipment Regulations 1998 came into force on 5th December 1998.

In these regulations, the term the '1974 act' refers to the UK Health and Safety at Work Act 1974.

The regulations apply to employers, persons having control of work equipment, persons who supervise and manage work equipment, and the self-employed in respect of the equipment they use at work.

All work equipment used by employees at work falls within the scope of "work equipment". For the purposes of this assessment "work equipment" is generally taken to mean machinery or combinations of machinery (complex assemblies / production lines).

Definitions:

New Work Equipment: Items of work equipment first provided for use from 5th December 1998 will need to meet the requirements of PUWER 98.

Second Hand Work Equipment: When existing work equipment is sold by one company to another, and it is brought into use by the purchasing company from 5th December 1998 it becomes new work equipment and must also meet the requirements of PUWER 98.

Work Equipment: Any machine, apparatus, tool, or installation used at work.

Use of Work Equipment: Any activity involving work equipment such as starting or stopping the equipment, its use, transport, repair, modification, maintenance, and servicing, and cleaning.

Danger Zone: Any zone within and/or around work equipment in which an exposed worker is subject to a risk to his health or safety.

Exposed Worker: Any worker wholly or partially in a danger zone.

Operator: The worker or workers given the task of using work equipment.

General:

Regulations 3 – 9

Place defined responsibilities on management to complement the requirements which are covered under the Health and Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999.

These regulations require site policies and procedures to be formulated and implemented to ensure that work equipment is safe for use and adequate measures are in place to ascertain the health and safety of employees whilst at work to the requirements of PUWER 98.

Regulation 4 requires employers to ensure that:

- The work equipment is suitable for the intended use.
- They assess the risk to the health and safety of the persons using the work equipment.
- Consider the working conditions in the premises and any additional risk posed using that equipment.

Regulation 5 requires employers to ensure that:

- That the work equipment is maintained in an efficient state, in efficient working order, and in good repair.
- Where the machinery has a maintenance log, they must ensure that it is kept up to date.

Regulation 6 requires the employer:

To ensure that where the safety of work equipment depends on the installation conditions, to ensure that it has been installed correctly and is safe to operate the work equipment is inspected:

- After installation and before being put into service for the first time.
- After assembly at a new site or in a new location.

The employer must also ensure that work equipment exposed to conditions causing deterioration which is liable to result in dangerous situations, and to ensure that the health and safety conditions are maintained, and that any deterioration can be detected and remedied in good time is inspected at:

- Suitable intervals and:
- Each time that exceptional circumstances which are liable to jeopardise the safety of the work equipment have occurred.
- Any such inspection must be carried out before any equipment leaves the premises or undertaking.
- If the equipment is obtained from another source or supplier, it must not be used unless accompanied by physical evidence from the source or supplier that the last inspection required has been carried out.

Regulation 7 requires that the employer:

Must ensure that where the use of work equipment is likely to involve a specific risk to health and safety that:

- The use of the equipment is restricted to those persons suitably trained to use the equipment and specifically given the task of using it.
- Repairs, modifications maintenance or servicing is restricted to persons specifically designated to perform these tasks, and that they have received adequate training to carry out the tasks.

Regulation 8 requires that the employer and his supervisors and managers of work equipment:

Must ensure that all persons who use work equipment have available to them adequate health and safety information and where appropriate, written instructions to the work equipment that are comprehensible to all those concerned. The information where appropriate shall include:

- The conditions in which and the methods by which the work equipment may be used.
- Foreseeable abnormal situations and the action to be taken if such a situation were to occur.
- Information from any conclusions to be drawn from experience of using the work equipment.

Regulation 9 requires that the employer:

Shall ensure that his supervisors and managers of work equipment, and all persons who use the work equipment have received:

- Adequate training for purposes of health and safety, including methods to be adopted when using the work equipment.
- Any information as to the risks which the use of the equipment may entail.
- All precautions to be taken when using the equipment.

Regulations 10 – 24.

Regulation 10 covers the initial integrity of machines (in most cases), and requires that the employer:

- Must ensure that an item of work equipment conforms at all times with any ‘essential safety requirements’, other than requirements which at the time of it being first supplied or put into service in any place which these regulations do not apply.

Regulations 11 – 24 cover the specific essential compliance requirements of machinery in the workplace.

Summation:

The regulations 3 to 24 can be summarised as follows:

Management Implemented Health and Safety Policies and Defined Procedures:

Regulation 3	Application
Regulation 4	Suitability of Work Equipment
Regulation 5	Maintenance
Regulation 6	Inspection
Regulation 7	Specific Risks
Regulation 8	Information and Instructions
Regulation 9	Training

Essential Safety Requirements of Machinery:

Regulation 10	Conformity with Community Requirements
Regulation 11	Dangerous Parts of Machinery
Regulation 12	Protection against Specific Hazards
Regulation 13	High or Very Low Temperature
Regulation 14	Controls for Starting or Making a Significant Change in Operating Conditions
Regulation 15	Stop Controls
Regulation 16	Emergency Stop Controls
Regulation 17	Controls
Regulation 18	Control Systems
Regulation 19	Isolation from Sources of Energy
Regulation 20	Stability
Regulation 21	Lighting
Regulation 22	Maintenance Operations
Regulation 23	Markings
Regulation 24	Warnings

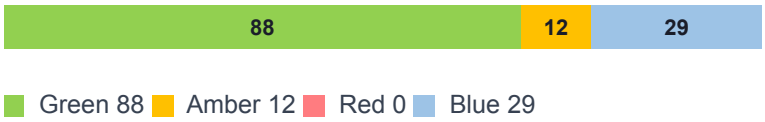
The following checklist assesses the compliance of the work equipment under inspection to the requirements of Regulations 1–24 in accordance with the inspection requirements of Regulation 6.

Vent Seal Machine 2

SUPPLY VOLTAGE 415 VAC	**CONTROL VOLTAGE** 24 VDC	**PNEUMATIC PRESSURE** 6 bar
MANUFACTURER No manufacturer infomation	**YEAR OF MANUFACTURE** No machine nameplate	

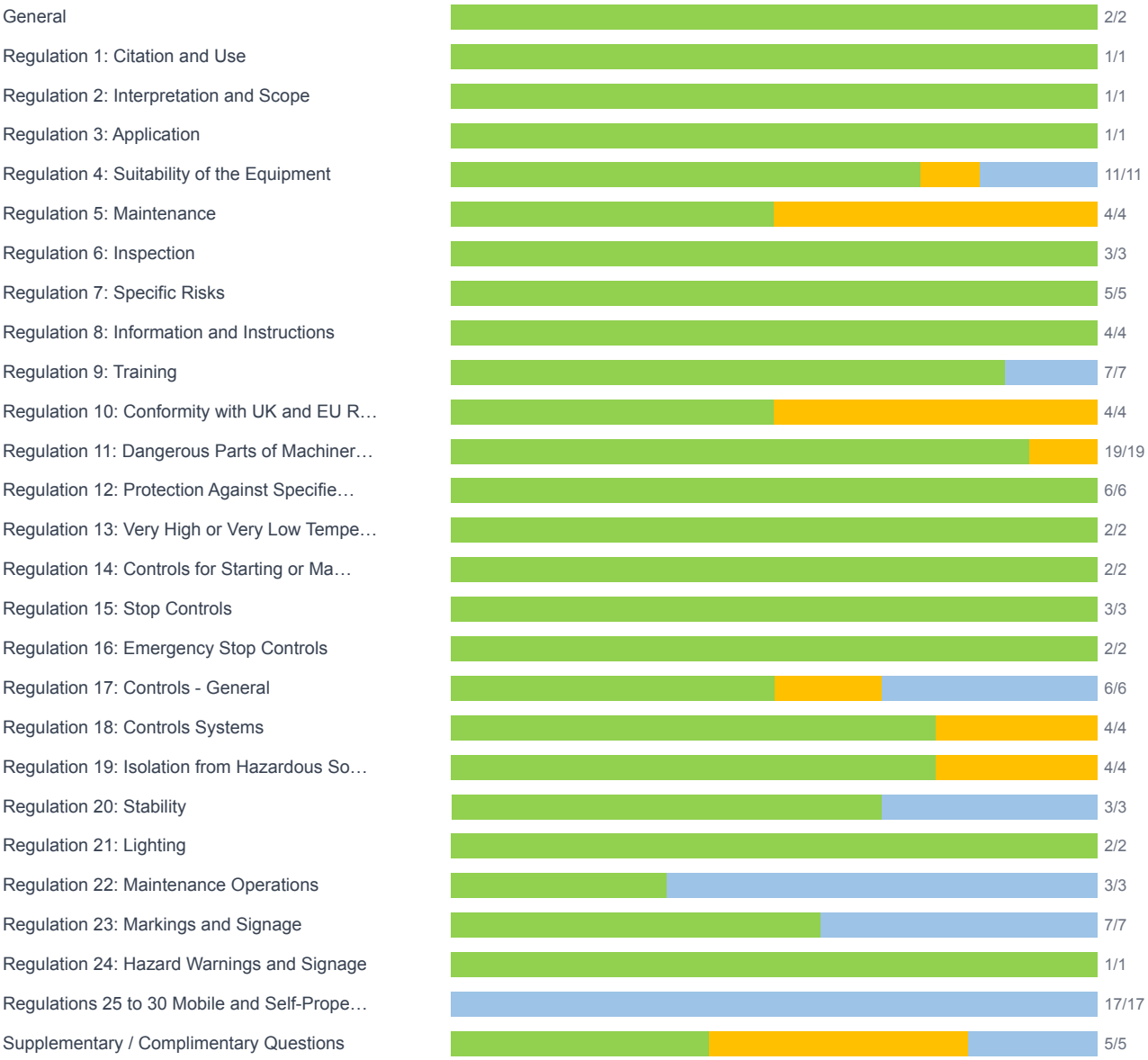
In Compliance (Green)	Non-Compliant (Red)	Action Required (Amber)	For Consideration (Blue)	Overall Compliance %
88	**0**	**12**	**29**	**88.0%**

STATUS BREAKDOWN



Green 88 Amber 12 Red 0 Blue 29

PER-REGULATION BREAKDOWN



General	Yes	No	N/A
1. Is there a current health and safety policy for the site?	✓		
Comments:			

General	Yes	No	N/A
2. Is there a responsible person for the health and safety policy?	✓		
Comments: ***Green:*** *The site responsible person is Myles Atkins.*			

Regulation 1: Citation and Use	Yes	No	N/A
3. Has the work equipment been brought into use by the company or owner / operator after 5th December 1998?	✓		
Comments:			

Regulation 2: Interpretation and Scope	Yes	No	N/A
4. Does the equipment come under the interpretation of work equipment as defined by PUWER 98?	✓		
Comments:			

Regulation 3: Application	Yes	No	N/A
5. Is the equipment specified in the PUWER 98 Regulations Section 3?	✓		
Comments:			

Regulation 4: Suitability of the Equipment	Yes	No	N/A
6. Is the equipment suitable by design, construction, or adaptation for the work it is provided to do in accordance with the manufacturer's specifications and instructions?	✓		
Comments:			
7. Have risk assessments been carried out on all work equipment?	✓		
Comments: ***Amber:*** *This was noted as work in progress*			
8. Is the equipment ergonomically well designed, positioned and located to reduce risks to the end user or operator of the equipment?	✓		
Comments:			
9. Have all ventilation requirements been considered and appropriate measures taken?	✓		
Comments:			
10. Have and are noise surveys assessments carried out?	✓		
Comments:			

Regulation 4: Suitability of the Equipment	Yes	No	N/A
11. Have and are lighting surveys / assessments carried out?	✓		
Comments:			
12. Are the confined space regulations applicable, and if so, have they been addressed, and the working procedures adequately documented?			✓
Comments:			
13. Are there any risks to personnel due to lone working, and if so, have they been addressed and working procedures adequately documented?			✓
Comments:			
14. Has the control of substances hazardous to health regulations (COSHH) been addressed correctly and are all necessary controls in place?	✓		
Comments:			
15. Are the COSHH assessments readily available to all persons concerned?	✓		
Comments:			
16. Where required under the COSHH assessments, is personal protective equipment (PPE) issued to the relevant personnel and is this adequately controlled?	✓		
Comments:			

Regulation 5: Maintenance	Yes	No	N/A
17. Has a formal maintenance system been implemented, either planned preventative or condition based for safety critical parts of work equipment?	✓		
Comments:			
18. Is the work equipment maintained in efficient working order and good repair?	✓		
Comments:			
19. Is there an authorised persons list stating who is competent to perform maintenance operations?	✓		
Comments: ***Amber:*** *This was noted as work in progress*			
20. Have all maintenance personnel received adequate training on health and safety and the safe use of work equipment?	✓		
Comments: ***Amber:*** *This was noted as work in progress*			

Regulation 6: Inspection	Yes	No	N/A
21. Are safety critical parts frequently checked and inspected for correct function?	✓		
Comments:			
22. Are work equipment safety inspection documents available, or is this the first inspection of the equipment?	✓		
Comments:			
23. Is the preventative maintenance log up to date?	✓		
Comments:			

Regulation 7: Specific Risks	Yes	No	N/A
24. Is use of the equipment restricted to those given the task of using it and trained to use it?	✓		
Comments:			
25. Are there safe working procedures in place for maintenance operations?	✓		
Comments:			
26. Is there adequate control over maintenance personnel moving from different departments or areas to ensure they are trained to maintain the work equipment in the other departments or areas?	✓		
Comments:			
27. Is there a permit to work system in place and are the working procedures adequately documented?	✓		
Comments:			
28. Is there a lock out / tag out policy and procedure and matrix in place for the safe isolation of work equipment from all hazardous energy sources?	✓		
Comments:			

Regulation 8: Information and Instructions	Yes	No	N/A
29. Are instruction manuals available for all work equipment where required?	✓		
Comments:			
30. Are there safe working procedures in place for use of the equipment where required?	✓		
Comments:			
31. Are written instructions on the safe use of work equipment available and are they understandable to the persons concerned?	✓		
Comments:			

Regulation 8: Information and Instructions	Yes	No	N/A
32. Are regular meetings held with employee's and / or employee representatives about any matters regarding Health and Safety?	✓		
Comments:			

Regulation 9: Training	Yes	No	N/A
33. Have operators received adequate training on health and safety and the safe use of work equipment?	✓		
Comments:			
34. Have supervisors received adequate training on health and safety and the safe use of work equipment?	✓		
Comments:			
35. Is there an authorised persons list as to who is competent to use the work equipment?	✓		
Comments:			
36. Is there adequate control over operators / personnel moving from different departments or areas to ensure they are trained to operate the work equipment in the other departments or areas?	✓		
Comments:			
37. Are there adequate controls in place for the prevention of young people (under the age of 18) being exposed to unnecessary risks?			✓
Comments:			
38. Are training records kept, and do they show the requirements for update and review and the person(s) responsible for training?	✓		
Comments:			
39. Is there adequate inductions and / or training for all employees including contractors, temporary employees / casual or agency workers, and visitors?	✓		
Comments:			

Regulation 10: Conformity with UK and EU Requirements	Yes	No	N/A
40. Was the machine first put into service after December 31st 1992?	✓		
Comments:			
41. Was the machine, regardless of age, placed for use in the EC after December 31st 1992?	✓		
Comments:			

Regulation 10: Conformity with UK and EU Requirements	Yes	No	N/A
42. Is the equipment UKCA or CE marked? *UKCA not applicable before 1st January 2022 and is optional from the 1st of August 2023. CE not applicable before 1st January 1993, mandatory after 1st January 1995; and mandatory for equipment first provided in the workplace after 5th December 1998 for PUWER 98.*		✓	
Comments: ***Amber:*** *A CE Mark was not found on the machine.*			
43. Is there a UKCA or CE Declaration of Conformity? *UKCA not applicable before 1st January 2022, and mandatory for equipment first provided in the workplace after 1st January 2023. CE not applicable before 1st January 1993, mandatory after 1st January 1995; and mandatory for equipment first provided in the workplace after 5th December 1998 for PUWER 98.*		✓	
Comments: ***Amber:*** *A Declaration of Conformity was not seen at the time of the PUWER assessment.*			

Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks	Yes	No	N/A
44. Are measures taken to prevent access to danger zones?	✓		
Comments:			
45. Can the machine be stopped before a danger zone can be accessed?	✓		
Comments:			
46. Are fixed guards used?	✓		
Comments:			
47. Are other guards or physical safety related control system protection devices used?	✓		
Comments:			
48. If fixed guards or other guards and protection devices are not used, are “push sticks”, jigs, holders or other devices used to reduce risk?	✓		
Comments:			
49. Are the guards, protection devices and other devices provided suitable for the purpose intended?	✓		
Comments:			
50. Are the guards of good construction, sound material, and adequate strength?	✓		
Comments:			
51. Are the guards maintained in an efficient state, efficient working order, and in good repair?	✓		
Comments:			

Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks	Yes	No	N/A
52. Do the guards themselves create any additional risk to health and safety?		✓	
Comments:			
53. Is it possible to easily bypass or disable the guards?	✓		
Comments: ***Amber:*** *The main drive shaft and drive chain is accessible from the front and side of the machine. Serious injuries are possible.*			
54. Are the guards secured with appropriate fixings in accordance with the requirements of the Machinery Directive 2006/42/EC and EN 14120?	✓		
Comments:			
55. Are the guards situated at a sufficient distance from the danger zone?		✓	
Comments: ***Amber:*** *The outfeed dispenser moves between 3 chutes. During this movement it is possible that a finger could be trapped or even severed.* ***Amber:*** *The main drive shaft and drive chain is accessible from the front and side of the machine. Serious injuries are possible.*			
56. Is it possible to view of the operating cycle of the machinery where guards are in place where such a view is necessary?	✓		
Comments:			
57. Do the guards allow operations necessary to fit and replace parts and for maintenance work, and in doing so do they restrict access so that it only allows access to the work area where possible without dismantling the guard or protective device?	✓		
Comments:			
58. Are appropriate measures adopted to stop people being trapped in the machine?	✓		
Comments:			
59. Where fitted are interlocks positive acting?	✓		
Comments:			
60. Where fitted are interlocks correctly positioned for use, and both secured and located in such a way to actively prevent defeat?	✓		
Comments:			
61. Where fitted do the interlocks function correctly?	✓		
Comments:			

Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks	Yes	No	N/A
62. Where fitted are all safety related control system actuators, input devices or electronic sensitive devices adequate for their purpose, and are they of the correct type?	✓		
Comments:			

Regulation 12: Protection Against Specified Hazards	Yes	No	N/A
63. Is there protection provided against any article or substance falling or being ejected from work equipment?	✓		
Comments:			
64. Is there protection provided against rupture or disintegration of parts of the work equipment?	✓		
Comments:			
65. Is there protection provided against work equipment catching fire or overheating?	✓		
Comments:			
66. Is there protection provided against the unintended or premature explosion of the work equipment or any article or substance produced, used, or stored in it?	✓		
Comments:			
67. Is there protection provided against the unintended or premature discharge of any article, gas, dust, liquid, vapour, radiation, or other substance which is produced, used, or stored in the work equipment that is hazardous to health?	✓		
Comments:			
68. Where the protection provided does not fully protect the operator, is personal protective equipment (PPE) issued to the relevant personnel and is this adequately controlled?	✓		
Comments:			

Regulation 13: Very High or Very Low Temperatures	Yes	No	N/A
69. Are all touchable hot or cold surfaces adequately guarded?	✓		
Comments:			
70. Where there is the possibility of hot or cold materials or substances being ejected, have adequate measures been applied to minimise the risk?	✓		
Comments:			

Regulation 14: Controls for Starting or Making a Change in Operation	Yes	No	N/A
71. Is there a start control provided to start the work equipment (including restarting after a stoppage for any reason)?	✓		
Comments:			
72. Are controls provided to make a significant change in the operating conditions (speed, pressure, etc.) where after the change it results in a greater risk to health and safety?		✓	
Comments:			

Regulation 15: Stop Controls	Yes	No	N/A
73. Is the work equipment fitted with one or more readily accessible stop controls to bring it to a stop in a safe condition and in a safe manner?	✓		
Comments:			
74. When the hazardous parts of the work equipment have stopped, is the energy supply to the actuators concerned switched off where necessary?	✓		
Comments:			
75. Does the stop control have priority over the start control or any control that changes the operating conditions of the work equipment?	✓		
Comments:			

Regulation 16: Emergency Stop Controls	Yes	No	N/A
76. Is the work equipment fitted with one or more emergency stop controls where required?	✓		
Comments:			
77. Does the emergency stop control have priority over any other all other controls including the normal stop control?	✓		
Comments:			

Regulation 17: Controls - General	Yes	No	N/A
78. Are all control devices clearly visible, identifiable, and appropriately marked by durable means for the environment in which they are located?		✓	
Comments: ***Amber:*** *Several machine controls are not identified. The identification are either worn or the legends has fallen off.* ***Amber:*** *The emergency stop button does not have a plain yellow to distinguish from other controls.*			
79. Are all control devices located outside danger zones excepting certain controls that are required within the danger zones i.e., robot teach pendants?	✓		
Comments:			

Regulation 17: Controls - General	Yes	No	N/A
80. Where controls are required in danger zones are they only reduced speed, hold to run, or enabling devices, or are other safeguards in place?	✓		
Comments:			
81. From the main control position, is the operator able to ensure that no person is present in the danger zone?	✓		
Comments:			
82. If it is possible that a person could be in a danger zone, is an audible, visible, or suitable warning given in accordance with regulation 24 whenever the machinery is about to start?			✓
Comments:			
83. Where a person can be in the danger zone is there a means to prevent starting of the work equipment and / or a means of warning the operator of their presence?			✓
Comments:			

Regulation 18: Controls Systems	Yes	No	N/A
84. Are the control systems safe?	✓		
Comments:			
85. Are control systems chosen making due allowance for failures, faults and constraints that can be expected to occur in the planned use of the work equipment?	✓		
Comments:			
86. Does the control systems operation minimise any risk to health and safety?	✓		
Comments:			
87. Does the control system ensure that when faults or damage to any part of the control system, or a loss of supply of any form of energy does not lead to an increased risk to health and safety - as far as reasonably practicable, are they fail safe?		✓	
Comments: ***Amber:*** *The machine is fitted with one safety relay. This is monitoring both the guard interlocks and the emergency stop.*			

Regulation 19: Isolation from Hazardous Sources of Energy	Yes	No	N/A
88. Is it possible to isolate the work equipment from all its energy sources?	✓		
Comments:			

Regulation 19: Isolation from Hazardous Sources of Energy	Yes	No	N/A
89. Are the means to isolate energy sources clearly identified by durable means and readily accessible (i.e., located between 0.6 and 1.9m above the service / floor level)?		✓	
Comments: ***Amber:*** *The isolation points on the machine are not clearly marked.*			
90. Are all energy isolation devices lockable and are they capable of being locked off and tagged off?	✓		
Comments:			
91. When energy sources are reconnected, are risks to health and safety prevented?	✓		
Comments:			

Regulation 20: Stability	Yes	No	N/A
92. Is the work equipment stable or is it provided with facilities to make it stable?	✓		
Comments:			
93. Are removable /moveable parts of the work equipment stable, or can they be made stable by clamping or otherwise?	✓		
Comments:			
94. If the work equipment is fitted with lifting equipment is it marked with its WLL (SWL), is it secure and stable, and is it inspected under LOLER?			✓
Comments:			

Regulation 21: Lighting	Yes	No	N/A
95. Is the lighting provided suitable for normal operation of the equipment?	✓		
Comments:			
96. Is the lighting provided suitable for setting and adjustment of the equipment?	✓		
Comments:			

Regulation 22: Maintenance Operations	Yes	No	N/A
97. Is it possible to shut down the work equipment completely to carry out maintenance operations?	✓		
Comments:			
98. If this is not possible, is it possible for such operations to be carried out, outside of the danger zones?			✓
Comments:			

Regulation 22: Maintenance Operations	Yes	No	N/A
99. If this is not possible, is it possible to take appropriate protection measures?			✓
Comments:			

Regulation 23: Markings and Signage	Yes	No	N/A
100. Does the work equipment bear the essential warnings and markings where appropriate for stop / start and all other controls and isolators?	✓		
Comments:			
101. Very high and / or very low temperatures and surfaces?			✓
Comments:			
102. Maximum speed?	✓		
Comments:			
103. Direction of Rotation?			✓
Comments:			
104. Correct gas, fluid, or substances and direction of flow identification?	✓		
Comments:			
105. Any other relevant markings to prevent mechanical injury such as crushing, entanglement or cutting and severing hazards etc?	✓		
Comments:			
106. Any other relevant markings to ensure health and safety such as pressure, radiation, explosive atmospheres or substances or strong magnetic fields etc?			✓
Comments:			

Regulation 24: Hazard Warnings and Signage	Yes	No	N/A
107. Are all appropriate warning signs and warning devices installed or fitted to the equipment where necessary?	✓		
Comments:			

Regulations 25 to 30 Mobile and Self-Propelled Work Equipment	Yes	No	N/A
108. Is the equipment designed to only carry the driver or person operating the equipment?			✓
Comments:			
109. Are any other persons expected to be carried?			✓
Comments:			

Regulations 25 to 30 Mobile and Self-Propelled Work Equipment	Yes	No	N/A
110. Are there signs on the mobile equipment stating the maximum capacity for carrying people?			✓
Comments:			
111. Are all unauthorised persons prevented from operating the equipment?			✓
Comments:			
112. Are adequate collision prevention devices fitted?			✓
Comments:			
113. Are suitable stop devices fitted to the equipment?			✓
Comments:			
114. For self-propelled equipment are there independent back up braking systems available in the event of failure?			✓
Comments:			
115. For remote controlled equipment are there automatic braking systems fitted to stop the equipment if it goes out of range of the transmitter or in case of the failure of the remote connection or general failure of the equipment?			✓
Comments:			
116. Does the equipment have adequate and active speed restriction devices?			✓
Comments:			
117. Is driver or operator visibility in front and behind the vehicle adequate at all times and are mirrors or sensors fitted to minimise blind spots?			✓
Comments:			
118. For remote controlled mobile equipment is used is there sufficient audible and visual warning devices in place for others close by the machine?			✓
Comments:			
119. Is the equipment stable under normal use conditions i.e., whilst moving, or when stationary for task completion purposes when used in accordance with the manufacturers operating instructions?			✓
Comments:			
120. Is the driver, operator or any passenger protected from falling off the moving equipment, are restraining systems fitted, and are policies and procedures such as SOP's and SSOW's in place to ensure that restraining devices are used?			✓
Comments:			

Regulations 25 to 30 Mobile and Self-Propelled Work Equipment	Yes	No	N/A
121. Are there adequate Roll Over Protection Structures (ROPS) Falling Object Protection Structures (FOPS) and Tip Over Protection Structures (TOPS) fitted to the equipment to prevent injury to the driver, operator, or any passenger?			✓
Comments:			
122. Does the driver, operator or any passenger have suitable protection from the moving or rotating parts, or drive shafts fitted to the equipment?			✓
Comments:			
123. Are drive shafts prevented from contacting the floor in both normal operation and failure scenarios?			✓
Comments:			
124. Is suitable firefighting equipment carried if required?			✓
Comments:			

Supplementary / Complimentary Questions	Yes	No	N/A
125. Are there any electrical safety or compliance issues with the equipment with respect to IEC EN 60204-1?	✓		
Comments: ***Amber:*** *Inadequate earth bonding*			
126. Are there any pneumatic safety or compliance issues with the equipment with respect to ISO EN 4414?	✓		
Comments: ***Amber:*** *Several pneumatic components have not been fitted as per the manufacturers installation instructions.*			
127. Are there any hydraulic safety or compliance issues with the equipment with respect to ISO EN 4413?			✓
Comments:			
128. Are there any safety or compliance issues with the equipment's safety related control system(s) with respect to ISO EN 13849?		✓	
Comments:			
129. Are there any other notable issues that are not covered within the scope of PUWER?		✓	
Comments:			

Conclusion & Findings

14 issues flagged — **0 Red** · **14 Amber** · documented in **10** hazards

Hazards Identified — Findings & Recommendations

HAZARD 1 · SITE POLICY AND PROCEEDURE · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q7** — Regulation 4: Suitability of the Equipment
  This was noted as work in progress
- **Q19** — Regulation 5: Maintenance
  This was noted as work in progress
- **Q20** — Regulation 5: Maintenance
  This was noted as work in progress

Hazard / Finding:

The site H+S team were reviewing the site wide policy and procedure at the time of assessment.

Vent Seal Machine 2

Recommended Remedial Action:

Finalise and formalise all changes and issue updates to all of the site team.

HAZARD 2 · CE MARKING OF EQUIPMENT · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q42** — Regulation 10: Conformity with UK and EU Requirements
  A CE Mark was not found on the machine.
- **Q43** — Regulation 10: Conformity with UK and EU Requirements
  A Declaration of Conformity was not seen at the time of the PUWER assessment.

Hazard / Finding:

A CE Mark was not found on the machine. The Declaration of Conformity was not seen at the time of the PUWER inspection

Vent Seal Machine 2

Recommended Remedial Action:

Rayovac should check that the equipment was delivered to site with a Declaration of Conformity.

Standards Referenced	
EN ISO 12100	Safety of machinery — General principles for design — Risk assessment and risk reduction
EN ISO 13849-1	Safety-related parts of control systems — Part 1: General principles for design
EN ISO 13849-2	Safety-related parts of control systems — Part 2: Validation

HAZARD 3 · REACHING DRIVEN PARTS OF THE MACHINE · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q53** — Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks
  The main drive shaft and drive chain is accessible from the front and side of the machine. Serious i
- **Q55** — Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks
  The main drive shaft and drive chain is accessible from the front and side of the machine. Serious i

Hazard / Finding:

It is possible to reach the main drive shafts and main drive chain from the front and side of the machine. Entanglement and serious crushing injuries are possible.

Access to moving parts

Recommended Remedial Action:

Install guarding to prevent access to the moving parts of the machine. The guards should be fitted with fixings that will require a tool to remove them.

Standards Referenced	
EN ISO 14120	Guards — General requirements for the design and construction of fixed and movable guards
EN ISO 13857	Safety distances to prevent hazard zones being reached by upper and lower limbs

HAZARD 4 · IDENTIFICATION OF CONTROLS · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q78** — Regulation 17: Controls - General
  Several machine controls are not identified. The identification are either worn or the legends has f

Hazard / Finding:

There are several controls for the machine which are not clearly identified. This could lead to confusion especially for new operators. This could lead to unexpected movements if controls are operated in error.

Identification of controls

Identification of controls

Recommended Remedial Action:

Ensure all controls are clearly and durably identified and suitable for the environment they are operating in.

Standards Referenced	
EN 60204-1	Electrical equipment of machines — Part 1: General requirements

HAZARD 5 · IDENTIFICATION OF THE EMERGENCY STOP · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q78** — Regulation 17: Controls - General
  The emergency stop button does not have a plain yellow to distinguish from other controls.

Hazard / Finding:

The emergency stop is missing a plain yellow background. Although it has a yellow collar this cannot be seen from the front.

Missing Yellow Background

Recommended Remedial Action:

The yellow background is fitted to distinguish it from other controls. Fit a plain yellow background to the emergency stop.

Standards Referenced	
EN ISO 13850	Emergency stop function — Principles for design

HAZARD 6 · IDENTIFICATION OF ISOLATION POINTS · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q89** — Regulation 19: Isolation from Hazardous Sources of Energy
  The isolation points on the machine are not clearly marked.

Hazard / Finding:

The machine has both electrical and pneumatic isolation points that have not been identified. During isolation it may be possible an energy source is still present. This could lead to unexpected movements

Identification of Isolation points

Identification of Isolation points

Identification of Isolation points

Recommended Remedial Action:

Ensure all isolations points are clearly identified, readily accessible and are capable of being locked off in the off position. They should be mounted above 0.6 m but below 1.9m. They should also be included in the LOTO procedure for the machine.

Standards Referenced	
EN 60204-1	Electrical equipment of machines — Part 1: General requirements
EN ISO 14118	Prevention of unexpected start-up

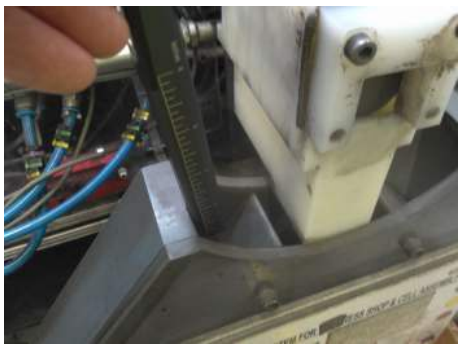
HAZARD 7 · CRUSHING AT OUTFEED DISPENSER · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q55** — Regulation 11: Dangerous Parts of Machinery - Guards and Interlocks
  The outfeed dispenser moves between 3 chutes. During this movement it is possible that a finger coul

Hazard / Finding:

The outfeed dispenser is pneumatically driven during operation. It is possible for a person to insert a finger into one of the openings. Should the dispenser move unexpectedly this could lead to crushing, cutting and severing. This is a position where the operator carries out tasks.



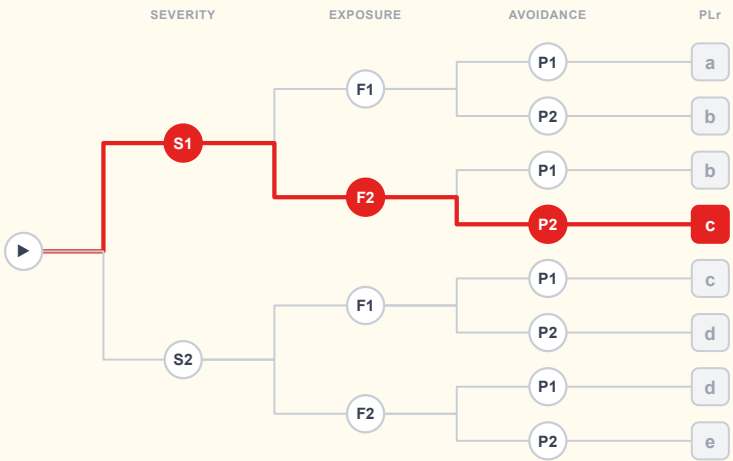
Moving dispenser

Recommended Remedial Action:

The dispensing arm must be guarded to prevent access during operation. If frequent access is required more than once a shift then an interlock guard is required. A fixed guard should be used for less frequent access. If an interlocked guard is used it should meet Performance Level PL'c' as a minimum.

Standards Referenced	
EN ISO 14120	Guards — General requirements for the design and construction of fixed and movable guards
EN ISO 14119	Interlocking devices associated with guards — Principles for design and selection

EN ISO 13849-1 — Required Performance Level: PLr c



SELECTED RISK PATH

S1 SEVERITY
Slight (normally reversible) injury

F2 EXPOSURE / DURATION
Frequent-to-continuous and/or long exposure

P2 POSSIBILITY OF AVOIDANCE
Scarcely possible to avoid

PLr c

HAZARD 8 · MOUNTING OF COMPONENTS · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q126** — Supplementary / Complimentary Questions
  Several pneumatic components have not been fitted as per the manufacturers installation instructions

Hazard / Finding:

Several components for the pneumatic system have not been mechanically secured. They have been place on the machine relying on the pneumatic hoses to keep them in place.

Components not mechanically secure

Components not mechanically secure

Recommended Remedial Action:

Correctly install the pneumatic components as per the manufacturers installation instructions.

Standards Referenced	
EN ISO 4414	Pneumatic fluid power — General rules and safety requirements for systems and their components

HAZARD 9 · EMERGENCY STOP NOT AVAILABLE AT ALL TIMES · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q87** — Regulation 18: Controls Systems
  The machine is fitted with one safety relay. This is monitoring both the guard interlocks and the em

Hazard / Finding:

The machine is fitted with one safety relay. This is monitoring both the guard interlocks and the emergency stop. Once a guard is open the emergency stop would no longer be available.

Inadequate safety related control system

Recommended Remedial Action:

The emergency stop should be available at all times. The emergency stop is considered a secondary safety device and the guard interlocks a primary safety device. The safety related control system should be upgraded so that the guards and emergency stop are monitored seperately.

Standards Referenced	
EN ISO 14119	Interlocking devices associated with guards — Principles for design and selection
EN ISO 13850	Emergency stop function — Principles for design
EN ISO 13849-1	Safety-related parts of control systems — Part 1: General principles for design

HAZARD 10 · INADEQUATE EARTH BONDING · ACTION REQUIRED (AMBER)

LINKED ISSUES

- **Q125** — Supplementary / Complimentary Questions
  Inadequate earth bonding

Hazard / Finding:

Although all the control panels were not open at the time of the assessment the ones captured in the report have been shown to be missing earth bonding on the doors. This is especially important when controls are mounted to the door. If an earth fault occurred it could lead to parts of the machine becoming live. It could also lead to a short circuit. Indirect electric shock could possibly ocurr

Inadequate earth bonding

Recommended Remedial Action:

Ensure where controls are mounted to panel doors that they are sufficiently earth bonded. The earth bonding should be tested and recorded.

Standards Referenced	
EN 60204-1	Electrical equipment of machines — Part 1: General requirements

Inspector's Overall Conclusion

(No overall conclusion recorded)

Key:	✓ Yes — Green	✓ No — Red	✓ Amber (Yes or No)	✓ N/A — Blue	✓ N/A — Plain

REPORT SIGN-OFF

ASSESSED BY:

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CMSE., CECE.
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Astute Machinery Consultants Ltd

Date: 24 Sept 2026

ISSUED BY:

Alastair Laurenson
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Date: 24 Sept 2026