

# No more skirting around the health and safety concerns of women's PPE

WEBBER WENTZEL

**Kate Collier: Partner at Webber Wentzel**

*e-mail: [Kate.Collier@webberwentzel.com](mailto:Kate.Collier@webberwentzel.com)*

In 2023, the Chief Inspector of Mines issued the updated Guideline for a Mandatory Code of Practice for the Selection and Provision of Personal Protective Equipment for Women in the South African Mining Industry.<sup>1</sup> Personal protective equipment (PPE) designed for men is unsuitable for women, and its use by female mineworkers has put their health and safety at risk. The Guideline outlines for mines what codes of practice (CoPs) they must incorporate to tackle these concerns.

While the 2023 Guideline retains the core elements of the version first published in 2015 under Section 49(6) of the Mine Health and Safety Act (MHSA), it seeks to address the very real body issues faced by female mineworkers. In previously male-centric work environments, the impact PPE has on menstrual health, as well as women's dignity, is a much-skirted topic. The 2023 Guideline recognises the importance of addressing women's unique health and safety concerns around work attire, particularly ill-fitting PPE designed for male proportions, which can impact their comfort, mobility, and wellbeing in the mining industry.

The objective of the Guideline is to provide a framework within which all South African mines must compile and implement a mandatory CoP addressing the provision of PPE for women in mining (WIM). It should take into account the unique health and safety concerns faced by women in various work roles, from underground miners to engineers and managers. The updated Guideline expands beyond the provision of PPE to address its selection, too.

The 2023 Guideline introduces an emphasis on the need to establish WIM structures at mine sites. These structures must reflect technical, professional, and managerial demographics, ensuring that women in various roles are included. This will foster a more gender-sensitive approach to occupational health and safety issues, informing decisions about the selection of appropriate PPE for female miners.

## INFORMED BY SIMRAC RESEARCH

A significant addition in the 2023 Guideline is a summary of the Safety in Mines Research Advisory Committee (SIMRAC) Research Project SIM 100904, which identified safety concerns related to PPE use for WIM.<sup>2</sup> The research project revealed that standard-issue PPE has not accommodated women's needs when they need to use the bathroom or change sanitary products. Ill-fitting PPE, such as overalls designed to male proportions, can be cumbersome to remove, making it difficult for women to address their sanitary needs. The research project found that this resulted in many women avoiding going to the bathroom or drinking water while on site. The health

risks associated with dehydration (especially in high-heat environments), ignoring the urge to urinate, and prolonged gaps between changing sanitary products can drastically affect the health, safety, and comfort of WIM.

Building on the findings of the SIMRAC research, the 2023 Guideline emphasises the need for greater consultation with female employees, before selecting and procuring PPE, to ensure that the selected protective equipment is purposed for the anatomical and physiological attributes of WIM. For example, it may be appropriate to give women the option to wear a two-piece overall, depending on the working environment. There is also a possible link between certain types of PPE used by women and an increased vulnerability to skin conditions such as contact dermatitis, chafing, rashes, and infections. The research highlighted the health and safety risks associated with the coping mechanisms that women developed in response to wearing ill-fitting PPE, designed and sized for men, such as lesions from wearing thick woollen socks to improve the fit of large safety boots.

## SANITARY AMENITIES FOR WOMEN AT MINES

The SIMRAC research emphasises the need for adequate sanitary amenities at mine sites. Historically, mining facilities did not include separate toilets for women. However, the increased presence of women in mining has highlighted the importance of dedicated and private female toilets, not only to attend to women's sanitary needs, but also to guard against gender-based harassment and associated safety concerns.

The updated Guideline recommends providing additional separate toilets per work section to ensure privacy, protection, and dignity for female mineworkers. Such toilets should be equipped with sanitary bins that are regularly emptied to dispose of sanitary products. Proper waste management in these facilities ensures hygiene and reduces health risks for WIM. In addition, facilities should be equipped with toilet paper and hand-washing facilities. Access to clean water is crucial to reduce the risk of infections, particularly for those who are menstruating. Well-lit areas surrounding toilets ensure safety for female users, especially during night shifts or in underground environments.



**Example of a work jacket designed for a female mineworker. It extends below the waist, with slits at the sides. The bust is darted to fit perfectly over the chest area. The zipper is metal for durability. In this case, the mine opted for a pink reflective strip for a special touch**

*Photograph: courtesy of MMPA*



**Example of a pair of work pants designed for a female mineworker. It has a high cut to prevent slipping and unwanted exposure when bending. There is a wider cut around the hips to ensure maximum comfort. A double-layer material is inserted in the crotch area to prevent fraying**

*Photograph: courtesy of MMPA*

## REVIEW OF CoPs

Employers in the mining sector should review and update their CoPs for the provision of PPE for women, aligning them with the more detailed framework provided in the 2023 Guideline. By addressing the challenges identified during the implementation of the 2015 Guideline, this updated version represents a positive step towards progress and gender equality in the industry, fostering a safer and more inclusive work environment for WIM. ♀

## REFERENCES

1. South Africa. Mine Health and Safety Act, 1996 (Act No. 29 of 1996). Guideline for a mandatory code of practice for the selection and provision of personal protective equipment for women in the South African mining industry. Government Gazette No. 49046; 2023 July 28 (published under Government Notice 3734). Available from: [https://www.gov.za/sites/default/files/gcis\\_document/202307/49046gon3734.pdf](https://www.gov.za/sites/default/files/gcis_document/202307/49046gon3734.pdf) (accessed 6 November 2024).
2. Zungu LI. Personal protective equipment for women in the South African mining industry. SIM 100904. Johannesburg: Mine Health and Safety Council; 2012.