

THE STUDY OF REGULATIONS RELATING TO SAFETY IN FACTORY

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ABSTRACT

This Independent Study Paper has been prepared with the purpose of identifying the problems of the regulations relating to safety in factory according to the Factory Act B.E. 2535 and the Occupational Safety Health and Environment Act B.E. 2554. It focuses on both legal and practical problems by comparing to the similar regulations in the Singapore and United States in order to point out the difference on the matter alike, as well as to be able to provide solutions to problems that might occur

This Independent Study Paper found out that there are two complications. In the first case, there is the complication of the regulation enforcement. In this case, there are two governmental sectors who are in charge of the control and monitor of matters in relation to safety in factory namely: the Ministry of Industry and the Ministry of Labour. This leads to the unnecessary waste of government's budget and human resource. In the second case, there is the complication of regulation compliance resulted from the issuance of different laws by two governmental sectors. These laws enforcing on factory operators prescribe requirements and standards differently, leading to confusion among factory operators, and doubled burden on factory operators when they need to comply with these repetitive laws. From the study of Singapore and United States, as it is found that there is only one piece of legislation

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enforcing on the factory safety, there is no problem with repetitive laws. Thus, the researcher suggests the guidelines to improve laws in relation to factory safety not to be repetitive and to be in accordance with an international standard. Nevertheless, since the transfer of all duties on such matter to one organization, as seen in other countries, is difficult, the researcher also suggests a solution. In such regard, there shall be an agreement between two organizations that providing that factory operators have already complied with either one piece of legislation, obtained permission from either ministry, it shall be deemed that such factory operators have already complied with or obtained permission from other ministry.

Introduction

The rise of industrial capitalism and the growth of the private market brought forward the factory system which depended on an unskilled laboring class and the use of power-driven machinery.

According to accidental statistics in industrial factory in 2015, the Department of Industrial Factory by Safety Technology Bureau has collected accident and fire information from various related department includes the Office of Industrial Factory Branch 1-5 and the Office of Monitoring and Evaluation. They collected the accidental information in their responsible province and media. All information were used not only for information, trend and causes of accident analysis but also for finding preventive measures against safety in industrial factory. In 2015, there were 105 accidents which were divided into four types includes (1)fires are 81 times (2) explosions are seven times (3) chemical substances leaks are seven times and (4) others includes machinery accident, electricity and natural disasters are ten times.¹ These events created many risks for workers including accidents and working diseases, and

¹ Safety Technology Bureau, Department of Industrial Factory, Industrial Factory Accidental Statistic in 2015, at <http://php.diw.go.th/safety/wp-content/uploads/2016/02/s58.pdf>, (last visited 31 October 2017).

resultant financial problems caused by an inability to workers. It shows that the existed safety in factory laws cannot help to reduce factory accidents. It is defective of laws, law enforcement and compliance of law.

In the present time, Thailand has two safety in factory laws includes Factory Act B.E. 2535 (1992) and Occupational Safety, Health and Environment Act B.E. 2554 (2011). They are applied in the same time and place overlapping. The factory safety standard should be high. The accident number should be decreased. Unfortunately, such laws cannot help to reduce accident in factory against workers. They are not be in the same direction. They created problems on law enforcement and law compliance.² In addition, they are burdens for state agencies and privates. On the part of state agencies, there are at least two Ministries to regulate including the Ministry of Industry and the Ministry of Labor. On the other hand, private sector is factory operators who are employers at the same time. It is redundancy of laws which shall arise many disadvantages such as waste of national budget, increasing superfluous expenses. The costs of production must be high results in high price of products.

In foreign countries, some counties have two safety in factory laws. Some countries have one factories safety law. In the present time, Singapore has one safety in factory law is implementing which is Workplace Safety and Health Act 2006. The Workplace Safety and Health Act came into effect on 1 March 2006 and with its coming into force, the former Factories Act³ was repealed.⁴ It is called repealed act. The Singapore Government impose the duties to control, regulate and supervise

² Phairach Chanduang, "Improvement of Laws Relating to Securing the Permit to Establish and Operate Factory in Facilitation of Investment: Study on the Repetition and Redundance of Laws," (Master Degree of Law Thesis, Graduate School, Ramkhamhaeng University, 1988), p.2.

³ Singapore Factory act 1973 (Cap 104, 1998 Rev Ed.)

⁴ Ravi Chandran, "The Workplace Safety and Health Act: An over view," Journal of Law 19 (January 2007): 15.

factory safety under Workplace Safety and Health Act 2006 which focuses on the health, safety and welfare of persons at working places instead of the former Factory Act. The Workplace Safety and Health Act covers all employer, factory operator and factory occupier. Their duties are accordance with the Workplace Safety and Health Act. In United States, there is only one law covers the safety in factory. It is Public law 91-596, which officially known as the Occupational Safety and Health Act 1970 and unofficially known as the Williams-Steigers Act. It is under responsibility of the Department of Labor, United States government. So, there is no problem on double law enforcement and law compliance.

Therefore, this study aims to examine the appropriate ways and probable means to integrate safety in factory laws to be harmoniously combination to solve these problems raised by this research.

The Problem of the Study

The laws and regulations are the measures to control, regulate and supervise the Factory. They should be clear and in the same direction. The government officials are the competent person to regulate and supervise the factory operation to conform the laws and regulations related to safety in factory which were imposed by the government. The factory operation may cause the losses to life and property of workers who are in the factory. In addition, the laws impose the power of the government officials and the punished measures against factory operators in many laws. They lead to the factory operators must be controlled, regulated and supervised from many different government department overlapping which they cannot avoid.

The study of regulations according to safety in factory examines the two laws including Factory Act B.E. 2535 (1992) and the Occupational Safety, Health and Environment Act B.E. 2554 (2011). Moreover, this Independent Study examines the Ministerial Regulations and the Notification of the Ministry which were issued by the Ministers under such two Acts.

The Problem of Organizations, Departments and Persons Who are authorized and Obligated to Control, Investigate and Regulate Factory Operations to be in Accordance with the Act

In regards to the factory's administration, safety is included according to the two acts aforementioned. This results in a factory operator, in accordance with the Factory Act B.E. 2535 who is also an employer in accordance with the Occupational Safety, Health and Environment Act B.E. 2554, being required to comply with official sectors taking charge and control of the execution of two laws issued by different ministries and official sectors. Also, the overall contents of the ministerial regulations issued by virtue of the two Acts are different and distinct from each other, yet there are some similar contents such as those talking about safety in factory.

It is therefore seen that this is the repetitive assignments of ministers who takes charge and control of the execution of the Acts via the issuance of ministerial regulations; to regulate person, place and time at the same time - wasting time and government budget spent by these two ministries.

From the researcher's opinion, the reason why these two ministries are still in charge and control on the matter of safety in factory is that they cannot agree on the matter of who will be the only ministry being solely in charge and control of the execution for the Acts, since they are both afraid of losing this government budget.

The two legislations empower the government officials to have the same power and duty, but only in different titles of legislation. The According to the Factory Act B.E. 2535, officials are under the control of Ministry of Industry,⁵ while those of Ministry of Labour⁶. Hence, these are provisions repetitively prescribing the power and duty of the government official in the same matter - which wastes government's human resources and importantly government budget spent by these organizations.

⁵ Section 6 Thai Factory Act B.E. 2535.

⁶ Section 5.

The Problem of Provisions about Safety Prescribing a Factory Operator's Duty

In regards to safety in workplace, the related provisions prescribe the factory operator's duty to comply with acts, ministerial regulations, and notification of the ministry for maintaining safety, preventing accidents that cause damages to workers, and preventing loss of life and properties during working. It is shown that there are many pieces of legislations that overlap one another. The writer categorizes them into three as following:

1. Location, Environment, Appearance of Building, Interior of the Factory

1) Confined Space

It is seen that the Factory Act B.E. 2535 prescribes the arrangement of the ventilation of the buildings and all kinds of factories (respirator and ventilator) suitable for working in a place lacking of air and ventilation only occasionally; it does not state about the case which the workplace lacks of air and ventilation all the time - as in the type, quantity and quality of the respirator or ventilator.⁷ In contrast, according to the Occupational Safety, Health and Environment Act B.E. 2554, there are provisions stating about the arrangement of personal safety equipment in all occasions⁸, including the occasion under the Factory Act B.E. 2535, but excluding the provisions stating that the compliance to the Occupational Safety, Health and Environment Act B.E. 2554 is deemed to be that of the Factory Act B.E. 2535 too. By having these two Acts prescribing, although not in an exact wording, in the same matter and place, is therefore considered as having two repetitive legislations- causing repetitive duties of a factory operator to comply with the same matter in both Acts.

2) Hospital or First Aid Room in Factory

⁷ Clause 24 Notification of Ministry of Industry No.2 B.E. 2513.

⁸ Clause 12 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Heat, Light and Noise B.E. 2559.

In a case of a workplace with no more than 10 employees, in regards to first aid kit and medical service, the Factory Act B.E. 2535 applies specifically. However, in a case of a workplace with more than 10 employees, both Factory Act B.E. 2535⁹ and Occupational Safety, Health and Environment Act B.E. 2554¹⁰ apply; the applications of both Acts are repetitive. The only difference between the two is that more details are given in the latter one; that there is a minimum higher standard that an employer is required to comply with. As a result, the provisions in the Factory Act B.E. 2535 are barely enforced. In addition, those provisions are too broad and so they can be interpreted without any scope, resulting in difficulties faced by a factory operator to comply with. This is different to the Occupational Safety, Health and Environment Act B.E. 2554, which is clear and certain. Therefore, the writer believes that the Occupational Safety, Health and Environment Act B.E. 2554 should be the only Act setting the minimum standard for this matter.

3) Toilet, Urinal, Wash Room in an Emergency

An example of the confliction between both laws are the provisions about the ratio of worker to toilet. Under the Factory Act B.E. 2535, the ratios are one toilet for 15 workers or less, two toilet for 40 workers or less, three toilet for 80 workers or less, and additional one toilet for additional 50 workers. IN contrast, under the Occupational Safety, Health and Environment Act B.E. 2554 in which the public health law is applied, the ratios are one toilet for 1-9 workers, two toilet for 10-24 workers, three toilet for 24-49 workers, and 5 toilet for 50-100 workers.

2. Machinery, Equipment, or any Material to be Used in the Factory

1) Electrical System in Factory

⁹ Clause 30 Notification of Ministry of Industry No. 2 B.E. 2513.

¹⁰ Clause 2 Ministerial Regulation on Labour Welfare in Workplace B.E. 2548.

The Factory Act B.E. 2535 uses the word “drawing demonstrating the installation of electrical system”¹¹, while the Occupational Safety, Health and Environment Act B.E. 2554 uses “a plan of electrical circuit”¹². Although these two are worded differently, they share a similar meaning. Therefore, these reflect repetitive provisions that the same word should be used to avoid confusion.

Furthermore, the Factory Act B.E. 2535 prescribes that the drawing shall be certified by an engineer or other persons announced by the Minister, albeit there is no announcement in such matter until now. The Occupational Safety, Health and Environment Act B.E. 2554 also prescribes that the electrical circuit shall be certified by an engineer or the Provincial Electricity Authority – in which is different. The certification by the Provincial Electricity Authority might cause a problem; the certification by the Provincial Electricity Authority which conforms to the Occupational Safety, Health and Environment Act B.E. 2554 still violates the Factory Act B.E. 2535. So these similar provisions state about the same matter, but in different details. Also, since the two Acts each prescribes that there shall be an investigation by an official, there will be two sets of officials which are from different departments. So, these are two repetitive duties.

2) Machinery

The installation, repair, and operation that shall be investigated by the Labour Inspector¹³ affiliated to the Ministry of Industry¹⁴, is a considered as a

¹¹ Clause 6(11) Notification of Ministry of Industry No. 2 B.E. 2513.

¹² Clause 14 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Electricity B.E. 2558.

¹³ Clause 5.

¹⁴ Clause 6 Ministerial Regulation No. 2 B.E. 2535.

provision empowering two departments on the same duty. Such investigation wastes government budget. There are also no provision stating that the investigation by one department shall be deemed as that of another.

3) Lift

The Factory Law's provision in relation to lift generally prescribes the deemed weight of each person to be 70 kilograms,¹⁵ which is not true in reality. This is different from the Occupational Safety, Health and Environment Act B.E. 2554¹⁶ that states the characteristics of a lift clearly and use the weight in a real basis (not by the number of passenger). These two provisions therefore repeat on the same matter, yet conflict to each other.

4) Boiler

The Factory Act B.E. 2535 prescribes that there shall be safety test and investigation for the use of a boiler¹⁷, and the Occupational Safety, Health and Environment Act B.E. 2554¹⁸ prescribes that the same content – this is repetitive. More importantly, the two Acts prescribe that this is the duty of a factory operator according to the Factory Law which is an employer according to the Occupational Safety, Health and Environment Act B.E. 2554. This means that the duty belongs to the same person, but only that it shall be done in different forms or formalities set by each department. Therefore, these are repetitive provisions prescribing the factory operator or employer to perform the same duty twice; wasting money since the performance of such duty once should be sufficient for safety and hazard prevention. Also, this unnecessarily

¹⁵ Clause 6 (12).

¹⁶ Chapter 1 Part 5 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Machine, Hoist and Boiler B.E. 2552.

¹⁷ Clause 15 Ministerial Regulation No.2 2535.

¹⁸ Clause 94 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Machine, Hoist and Boiler B.E. 2552.

puts burden to both departments, which adds up expenses and wastes government budget. Moreover, there is no provision prescribing that the compliance of one Act is deemed to be that of another.

3. Safety of Factory Operation

1) Environment in Workplace (Heat, Light and Noise)

First, on the matter of a report, the Factory Law prescribes that the report shall be in compliance to the rules set by the Minister of Industry. The occupational Safety, Health and Environment Act B.E. 2554 prescribes the rule, procedure, and duration of measurement and analysis in compliance with the Director-General of Welfare and Labour's announcement on the same matter, but only in a different form. Hence, these are repetitive provisions on the matter of measurement and analysis of the working environment, which causing a factory operator to has to comply with two sets of rules set by two departments - doubling a burden and wasting money.

Second, the two laws also prescribe in a similar manner. The Factory Law prescribes that the report shall be kept onsite readily for an inspection by a competent official. This means that an official will have to travel to a factory for an inspection. The Occupational Safety, Health and Environment Act B.E. 2554 prescribes that the report shall be kept at a factory for the Safety Inspector's investigation as well. It is seen that the Safety Inspector under the Ministry of Labour will also have to travel to a factory for an inspection as same as an official under the Factory Law. Therefore, this is repetitive duty on the exact same matter that is unnecessary. Both officials should not have been required to perform such same duty because this is wasting of government budget spending on their salaries. Also, there is no provision stating that the compliance of one law is deemed to be that of another.

2) Water System for Fire Extinction

The both laws prescribe that there shall be sprinkler fire system in workplace in a similar manner, which is repetitive - but there are some different

contents. In case of the Factory Law, a factory operator shall provide water in sufficient amount for the use of sprinkler fire system for at least 30 minutes without taking the size of building into account.¹⁹ In contrast, the Occupational Safety, Health and Environment Act B.E. 2554 whilst prescribing about that there shall be sprinkler fire system and other equipment for primary fire extinction in all parts of a building, dismisses the period of continuous use of sprinkler fire system.²⁰ The latter just prescribes that the system shall be sufficient. This is the case which two laws, which is in the same hierarchy, prescribe differently in the same matter. Providing a factory operator complies with one law, he will certainly violate another and vice versa. Even worse for a factory operator, these are criminal laws with penalties namely: imprisonment, fine or both.

3) Automatic Fire Extinction

The factory Law prescribes that there shall be an automatic fire extinction system only in the case of a factory with inflammable products and lands connecting to one another from 1,000 metre square and above.²¹ In other words, a factory without inflammable products and lands connecting to one another from 1,000 metre square and above, has no obligation to have such automatic system. In contrast, the Occupational Safety, Health and Environment Act B.E. 2554 does not state about the aforementioned case, it indeed prescribes that providing that an employer wants to have such automatic system, he will have to follow Clause 14. This provision, therefore, provides an employer with the right to choose, not an obligation. As a result, there is a legal gap that a factory operator could avoid providing such automatic

¹⁹ Clause 10 Notification of the Ministry of Industry on Fire Protection and Settlement B.E. 2552.

²⁰ Clause 12 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Fire Prevention and Extinguishing of Fire B.E. 2555.

²¹ Clause 17 Notification of the Ministry of Industry on Fire Protection and Settlement B.E. 2552.

system in the following cases: (1) a factory without inflammable products and lands connecting to one another from 1,000 metre square and above, (2) a factory with inflammable products but no lands connecting to one another from 1,000 metre square and above, and (3) a factory with lands from 1,000 metre square and above but not connecting to one another. The aforementioned cases are the legal gap that a factory operator can avoid to provide the automatic system, albeit the appearance of factory could be hazardous to workers in case of fire.

4) Fire Prevention

There are contents repeating on fire prevention and fire extinction training, but some details are different. Under the Factory Act, each worker is required to be trained, whereas under the Occupational Safety, Health and Environment Act B.E. 2554 only 20 per cent of employees in each department are required to be trained.²² This demonstrates the laws, in the same hierarchy, sharing the same subject matter, but with contradicting details – causing confusion and difficulties for a factory operator to follow.

5) Factory Fire-Fighter

The Factory Law prescribes that (1) there shall have person(s), on duty for factory safety, to assess the safety in relation to fire for at least once a month, (2) an evidence of such assessment shall be kept onsite readily for an inspection by an official,²³ while the Occupational Safety, Health and Environment Act B.E. 2554 prescribes that there shall always have an employee readily onsite for fire extinction

²² Clause 27 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Fire Prevention and Extinguishing of Fire B.E. 2555.

²³ Clause 26 Notification of the Ministry of Industry on Fire Protection and Settlement B.E. 2552.

during working hour,²⁴ these laws are repetitive. By interpreting the two laws, apart from a monthly assessment, there shall always be an employee readily onsite for fire extinction during working hour in case of a factory is likely to catch severe fire - which additionally provides employees with an extra protection. Nevertheless, these two laws, which are in the same hierarchy, prescribe the same matter with contradicting details. This results in difficulties for a factory operator to follow; as in he might fail to comply with one of these. Providing the two laws are combined into one, it would be of convenience for a factory operator.

Conclusion

The Factory Law and the Labour Law share the same objective, which is to protect a worker from any accident or danger in workplace, prevent any loss of lives and properties belong to workers, and particularly protect a worker whom considered as an essential resource for the nation development.

In regards to the factory operation, a factory operator, who is an employer of a worker or an employee in the same workplace, is controlled, regulated, and monitored by many government sectors; especially the Ministry of Industry and the Ministry of Labour. The Ministerial Regulations are also involved in the factory operation namely: the Factory Act, B.E. 2535 and the Occupational Safety, Health and Environment Act B.E. 2554. The application of both laws is repetitive at many points ranging from contents to the authority to enforce such laws, which double the budget the government needs to spend on this. Furthermore, this also double the duty of a factory operator to unnecessarily comply with both laws, while he is still not certain of which law to comply with when the two laws conflict. Providing the investigation and amendment in regarding to repetitive contents are carried out, not only does this benefit the government sectors involved; but also the private sector. In other terms, the

²⁴ Clause 17 Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Fire Prevention and Extinguishing of Fire B.E. 2555.

factory operator would certainly know the precise scope of his duty. In order to do this, the government sectors involved is required to have a seminar or a discussion about the separation of each authority to avoid any repetitiveness. In fact, nothing has been done much to solve the problem and so there shall be a prompt solution and further development of such laws. This could help diminish the duty to comply with the two laws by both government and private sectors, and generally develop the nation in accordance with the set goal by the elimination of all repetitive laws especially in relation to the occupational safety. From the past until now, the factory operation is advanced both scientifically and technologically. As a result, the manufacture which is now in an industrial scale together with other technology used have effects on public health. Therefore, it is of significance for any officials or government sectors involved to intervene such factory operation, in order to protect the public health, environment, and factory workers specifically - by issuing various pieces of legislations covering all aspects. Unfortunately, these legislations, on the same matter of workplace protection measurement, conflict to one another. Hence, in order to achieve objective of the laws on such matter, the laws themselves shall be precise, not conflicting, and not repetitive. In this way, the enforcement of such laws by government would be effective since a factory operator could correctly and easily comply with them.

There are two laws on the occupational safety namely: the Factory Act, B.E. 2535 and the Occupational Safety, Health and Environment Act B.E. 2554. If there are many laws and so many government sectors in charge of their enforcement, the accident rate in workplace should decrease. In fact, the accident rate is still continuously escalating. This illustrates that the enforcement of two laws at the same time on the same matter does not support each other, but merely repeat each other. Therefore, there shall be an amendment in order to alleviate the duties of both government and private sectors.

From the study, it is found that the repetitiveness of such laws, doubling the duties of government and private sectors are s followed:

1. Organizations or government departments and officials empowered to regulate, investigate, and monitor the execution of acts namely: the Minister who takes charge and control of such execution, and an official who has the same power

2. Legislations on the occupational safety prescribing a factory operator's duty

From the study, it is found that there are three repetitive points as followed: (1) Location, Environment, Appearance of Building, and Interior of the Factory comprised of Unventilated and Confined Space, Hospital or First Aid Room, and Toilet, Urinal, Wash Room in an Emergency, (2) Machinery, Equipment or any material to be used un the factory comprised of Electricity System, Lift, Boiler, (3) Safety for Factory Operation comprised of Work Environment, Water System for Fire Extinction in Factory Building, Automatic Fire Extinction System, and Fire Prevention and Fire Extinction Training.

However, in Singapore and the United States, there is only one law on occupational safety in factory. In Singapore, the Workplace Safety and Health Act 2006 is enforced, whilst in the United States, the Occupational Safety and Health Act 1970 is enforced. As a result, there is no problem found in Thailand. The writer therefore recommend that the government shall promptly take a necessary step to solve this problem.

Recommendations

1. The standard of safety in each aspect in case of many ministries are involved in such standard:

1) All ministries should consider the use of only one same form or standard for all ministries.

2) The investigation result in relation to the safety standard of one ministries (in accordance with its formality) should be accepted by other ministries.

3) In case that an announcement in relation to the safety standard has already been announced by one ministry, and providing that another ministry has not

announced, the latter ministry should use the previous announcement as its standard - in order to avoid redundancy.

2. Overall, in relation to the safety in workplace, there should be only one governmental ministry which is responsible for the control and monitor of the compliance of laws and regulations. For example, the Ministry of Industry could responsible for factory matters, whilst the Ministry of Labour could responsible for the safety management, safety culture, safety practice, etc. - or any worker's operation should be responsible by the Ministry of Labour. However, in fact, there should only be one ministry, which is in charge of everything. This is an international standard, seen in Singapore and the United States where The Ministry of Manpower and the Department of Labor are the only authorities respectively.

3. Nowadays, Thailand has the Licensing Facilitation Act B.E. 2558, which acts as a central legislation, clearly prescribing procedures and duration for the permission consideration. The act also prescribes that there should be a one-stop service centre providing information to people and receiving the request for permission, which would facilitate people. In this regard, the Factory Act B.E. 2535 states about this matter clearly, which is very up-to-date, in section 31 that governmental ministries could jointly make a decision or delegate its authority to any ministry. Therefore, we should comply strictly with this law in order to reduce the repetitive procedures.

4. From the study of Singapore's legislation, it is found that Singapore used to apply both Factory Act 1973 and Workplace Safety and Health Act 2006. However, once the enforcement of the Workplace Safety and Health Act is announced, the enforcement of the Factory Act is revoked. Besides, the United States has been enforcing one legislation, which is the Occupational Safety and Health Act 1970. Hence, the two countries do not face the problem Thailand is facing now because there is only one legislation and authority responsible for the compliance of such legislation.

5. In regard to the different terms, causing confusion and importantly unnecessary burdens to factory operators, such as Factory Operator vs. Employer and Worker vs. Employee - which these people are the same person indeed. Other examples

are, Accident under the Factory Act might not be that of under the Occupational Safety Act, or it could be under both Acts - resulting in two reports overly unnecessarily submitted to two ministries. Even worse than that, these two ministries are just called in different names, albeit there are at the same place. I therefore recommend that only one term should be used.

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