MEDICAL SURVEILLANCE OF OCCUPATIONALLY EXPOSED WORKERS

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Authorization

The Radiation Act stipulates that the party running a radiation practice is responsible for the safety of the operations. The responsible party is obliged to ensure that the level of safety specified in the ST Guides is attained and maintained.

Under section 70, paragraph 2, of the Radiation Act (592/1991), STUK – Radiation and Nuclear Safety Authority (Finland) issues general instructions, known as Radiation Safety Guides (ST Guides), concerning the use of radiation and operations involving radiation.

Translation. In the event of any differences in interpretation of this guide, the Finnish and Swedish versions shall take precedence over this translation.

1 General

This ST Guide covers medical surveillance of workers engaged in radiation work and their fitness for this work, protection of the foetus and infant during the worker's pregnancy or breastfeeding, and medical surveillance measures to be taken when the dose limit has been exceeded. The Guide also covers recognition of practitioners responsible for medical surveillance of category A workers, medical certificates to be issued to workers, and preservation and transfer of medical records.

The medical surveillance requirements specified in this Guide cover the use of radiation and nuclear energy. The Guide also applies to exposure to natural radiation.

The definitions of the terms used in this Guide are presented in Appendix A.

The arrangements for occupational health care of workers are generally laid down by the Occupational Health Care Act (1383/2001) and statutes issued pursuant thereto. The arrangement of medical surveillance of category A workers engaged in radiation work is laid down in chapter 9 of the Radiation Act (592/1991) and chapter 3 of the Radiation Decree (1512/1991). The arrangement of medical surveillance for workers exposed to natural radiation is laid down in sections 28 and 28 a of the Radiation Decree. Section 13 of the Radiation Decree authorizes STUK to issue guides for the implementation of medical surveillance of workers engaged in radiation work.

2 The purpose of medical surveillance

The purpose of medical surveillance of workers engaged in radiation work shall be

- to ensure that the worker is fit for radiation work and that the worker's state of health constitutes no impediment to performing the said work
- to monitor the worker's state of health during radiation work particularly with a view to detecting any changes that constitute an impediment to continuing to perform such work
- to determine the health impact of any exposure to radiation that is found to have, or is suspected of having exceeded the dose limit or been otherwise abnormal.

The examples provided in Appendix B may be used when assessing the fitness of a worker for radiation work.

3 Duties of the responsible party

3.1 Health surveillance of workers must be arranged

To protect the health of radiation workers, the party running a radiation practice (hereafter the responsible party) must

- arrange medical surveillance for their workers
- classify the workers into radiation work categories A and B; a worker who is unfit for category A for health reasons may neither be placed in this category nor assigned to corresponding duties.
- appoint a medical practitioner responsible for medical surveillance of category A workers. It is good practice to arrange this by ensuring that the medical practitioner responsible for medical surveillance of category A workers is the person who is also responsible for the responsible party's occupational health care in other respects. For responsibility of the medical surveillance of an outside worker, see item 3.3.
- report the worker's intended radiation work category to the medical practitioner who will perform a pre-employment examination on the worker. The pre-employment examination of a worker belonging to category A can only be performed by a medical practitioner in charge of medical surveillance whose qualifications have been verified by a competent authority. The medical practitioner must also be provided with information on the worker's duties, working conditions and occupational hazards (see Appendix B) to enable the practitioner to decide on the worker's fitness for work and on medical surveillance.

3
• notify the practitioner responsible for medical surveillance of category A workers of any changes in the classification of these workers and of any changes in operations that are significant for medical surveillance. If the medical surveillance has not been carried out by the medical practitioner appointed by the responsible party, but by another medical practitioner found to be qualified by a competent authority (see item 3.3), the worker himself/herself must be notified that he/she needs a new medical certificate for the medical examination.

• immediately report to the worker, the radiation safety officer responsible for radiation safety, the medical practitioner responsible for medical surveillance and STUK about a found or suspected exceeding of a dose limit or other significant observation concerning safety. In these cases, the follow-up measures and urgent treatment procedures for the worker ordered by the medical practitioner must be carried out.

• where necessary, arrange special medical surveillance for a worker in accordance with item 5.4 of this ST Guide.

The arranging of medical surveillance is laid down in the Occupational Health Care Act, the Government Decree on medical examinations in work that presents a special risk of illness (1485/2001) and the Government Decree on the principles of good occupational health care practice, the content of occupational health care and the qualifications of professionals and experts (1484/2001). The classification of workers engaged in radiation work is provided in section 32 of the Radiation Act and section 10 of the Radiation Decree; the classification is discussed in greater detail in Guide ST 1.6. The conditions for prohibiting a person from engaging in radiation work are laid down in section 33 a of the Radiation Act. Provisions concerning the protection of a foetus and a breast-fed infant are laid down in section 5 of the Radiation Decree. Provisions governing the transfer of a pregnant worker to other duties are laid down in chapter 2, section 3 of the Employment Contracts Act (55/2001). The associated arrangements are governed by the provisions of the said Act and of the Sickness Insurance Act (1224/2004).

3.2 Foetuses and breast-fed infants must be protected
To protect the foetus, the responsible party must encourage a worker engaged in radiation work to report her pregnancy to the responsible party as early as possible.

When a woman engaged in radiation work has announced her pregnancy, her work must be organized so that the equivalent dose to the foetus is kept as low as reasonably achievable and that for at least the remainder of the pregnancy the dose does not exceed the value of 1 mSv. The responsible party must decide whether the pregnancy requires any reorganization of duties. This decision will depend on the results of radiation exposure monitoring and on the possibility of a work-related abnormal event. Under no circumstances may a pregnant worker engage in the duties of a category A worker.

When a woman has announced she is breast-feeding a child, she is not allowed to engage in work where the radioactive substances that end up in her body might cause an effective dose in excess of 1 mSv to the child.

To protect a pregnant worker and her foetus, the worker can be transferred to other duties for the duration of her pregnancy, provided that certain conditions are met.

Provisions concerning the protection of a foetus and a breast-fed infant are laid down in section 5 of the Radiation Decree. Provisions governing the transfer of a pregnant worker to other duties are laid down in chapter 2, section 3 of the Employment Contracts Act (55/2001). The associated arrangements are governed by the provisions of the said Act and of the Sickness Insurance Act (1224/2004).

3.3 Outside workers must be subjected to medical surveillance
The responsible party must ensure that medical surveillance is also arranged for those workers and self-employed persons who participate in radiation work assigned by the responsible party and governed by the responsible party’s safety licence, without entering the service thereof (outside workers). The responsible party and
the employer of the outside worker (an outside undertaking) or the self-employed person can make an agreement on how the duties associated with medical surveillance are carried out.

When the outside worker is supposed to engage in work that exposes him/her to radiation in the controlled areas, the responsible party must ensure and adequately document that the medical practitioner responsible for medical surveillance has found the worker fit for category A radiation work and that appropriate medical surveillance has been provided to the worker.

Provisions governing the responsible party’s obligation to arrange medical surveillance for outside workers are laid down in section 37 a of the Radiation Act. Outside workers and the division of responsibilities between the responsible party and an outside undertaking is discussed in greater detail in Guide ST 1.6.

4 Qualifications, duties and tasks of the medical practitioner responsible for medical surveillance

The medical practitioner responsible for medical surveillance of category A workers must be conversant with occupational health care and the health effects of radiation. The qualifications of a medical practitioner to serve as a responsible practitioner are recognized by the competent authority*. The competent authority maintains a register of recognized medical practitioners.

Familiarity with occupational health care is governed by separate provisions on the requirements for medical practitioners serving in occupational health care.

A medical practitioner will be familiar with the health effects of radiation after receiving the basic, further and supplementary training in radiation protection required of a practitioner performing medical surveillance. If radiation protection training is not included in the basic or further training of a medical practitioner, this training may be completed separately. One example of this might be the introductory training on the use and effects of radiation that is arranged by the Finnish Institute of Occupational Health.

A practitioner responsible for medical surveillance must be familiar with the working conditions of the worker.

A practitioner responsible for medical surveillance who ceases to perform the said duties must immediately notify the responsible party thereof, so that the said party may attend to its duty of arranging medical surveillance.

Provisions concerning the skills and knowledge of the medical practitioner in charge of the medical surveillance of category A workers are found in section 13 of the Radiation Act. The basic, further and supplementary training in radiation protection required from a medical practitioner is discussed in Guide ST 1.7. Separate requirements for a medical practitioner operating in occupational health care are laid down in the Occupational Health Care Act, section 16 of the Government Decree on the principles of good occupational health care practice, the content of occupational health care and the qualifications of professionals and experts (1484/2001) and the Act on Health Care Professionals (559/1994).

5 Matters included in the medical surveillance of a category A worker

Medical surveillance of a category A worker must include a pre-employment examination and periodic health reviews.

5.1 Medical surveillance starts with a pre-employment examination

The pre-employment examination performed by a practitioner responsible for medical surveillance must include an investigation of the worker’s case history, a clinical examination and any laboratory tests and other examinations that the practitioner deems necessary. The details of the case history should also include details of any radiotherapy or radionuclide therapy that the worker has undergone. The purpose of the examination is to verify the worker’s fitness to serve as a category A worker.

*) Currently, this authority is STUK.
The pre-employment examination must be performed before the radiation work begins. In a fixed-term employment relationship an examination performed less than one year earlier may be accepted as a pre-employment examination, provided that no significant changes have occurred in the worker’s duties, working conditions and exposure.

Fitness for service as a category A worker must be classified under the following headings:
• fit for service
• fit for service under the following conditions (to be specified)
• unfit for service.

The examples provided in Appendix B may be used when assessing the fitness of a worker for radiation work.

The need for protecting a foetus must be emphasized whenever the person being examined is a woman of fertile age.

5.2 Health must be monitored regularly
A practitioner responsible for medical surveillance must monitor the health of every category A worker in order to assess whether the worker remains fit for duty. The nature and scope of the monitoring will depend on the nature of the work and on the worker’s state of health.

For the purpose of health reviews, the responsible party must ensure that the practitioner responsible for medical surveillance is provided with details of the worker’s radiation exposure and other necessary information concerning changes in the character of the work and in working conditions.

The worker must attend an examination performed periodically by the practitioner responsible for medical surveillance at intervals determined by the said practitioner, but at least once every three years. In the intervening years the practitioner must review the worker’s health by other means at least annually. At the practitioner’s discretion, in addition to the information on the radiation exposure of the worker and any changes in the nature of work and working conditions supplied by the responsible party, it is sufficient in the intervening years for the worker to report on his/her state of health in writing. The practitioner must make an appropriate entry in the worker’s medical record concerning the health review. However, the worker must be given an opportunity to attend an annual medical examination should he/she so desire.

If an observation made in the course of medical surveillance gives cause to investigate whether a worker has been exposed to radiation in an abnormal manner, the medical practitioner must contact STUK as necessary. However, this must not delay any appropriate further examination or treatment measures.

The practitioner responsible for medical surveillance may report the need to continue medical surveillance for as long as necessary to protect the worker’s health, even after the radiation work has ended.

The provisions in section 13 of the Radiation Decree govern how the practitioner responsible for medical surveillance shall report to STUK whenever exposure to radiation in an abnormal manner is suspected.

5.3 Extraordinary medical examinations
An extraordinary medical examination is warranted when
• a substantial change occurs in a worker’s state of health
• a worker has been declared fit for service as a category A worker only on certain conditions and some change occurs in the character of his duties.

5.4 Special surveillance is needed when the dose limit is exceeded
Special medical surveillance must be arranged if it is found or suspected that any of the dose limits have been exceeded. The responsible party must arrange any further measures that the medical practitioner responsible for medical surveillance in these cases deems necessary to protect the worker’s health. Such further measures might include, for example, further examinations, decontamination measures and urgent treatment procedures.

If there is cause, in cases of accident, to suspect sudden, exceptionally high exposure to radiation (a dose exceeding 0.5 Sv), a complete blood count must be performed for the exposed person. The first sample for the blood count
should be taken immediately after the exposure and the next sample should be taken 24 hours after the exposure. The dose estimate will be further specified on the basis of the changes that are detected in the blood counts and an inference may be drawn as to the exposed person’s clinical prognosis. The condition of the person must be closely monitored. Any bout of nausea within a few hours of the incident may indicate life-threatening radiation sickness.

A chromosomal analysis will be necessary if there is no other way to secure a sufficiently reliable estimate of the radiation dose sustained by the worker through abnormal exposure. Instructions for performing a chromosomal analysis are available from STUK.

If a worker’s annual dose limit is exceeded, an ophthalmic examination should be considered to check for radiation-induced cataracts.

The practitioner responsible for medical surveillance must issue a statement indicating the conditions under which a category A worker may resume radiation work after a dose limit has been exceeded.

*Dose limits in radiation work are laid down in section 3 of the Radiation Decree. Section 33 of the Radiation Act contains provisions concerning the obligation of the medical practitioner responsible for medical surveillance to issue a statement on the worker’s capability to continue in radiation work after a dose limit has been exceeded.*

5.5 **Results of the medical surveillance must be saved in a medical record**

The practitioner responsible for medical surveillance must establish a medical record for the purpose of monitoring the health of each category A worker. The medical record must include:

- details of the worker’s previous duties and service relationships that are necessary for medical surveillance and may be relevant for radiation work; these details are to be requested from the worker in writing, using, for example, a form to be signed by the worker
- details of the nature of the worker’s duties and the category of the worker
- the findings of the pre-employment examination and of periodic health reviews
- the findings of any extraordinary medical examination and of any special surveillance due to an exceeded dose limit
- the results of the worker’s radiation exposure monitoring.

The medical record must be kept up-to-date for as long as the worker remains a category A worker. Thereafter the record must be kept until the worker attains or would have attained the age of 75 years. In all cases the record must be preserved until 30 years have elapsed from the end of the radiation work.

If the medical practitioner responsible for medical surveillance changes, the medical record must be given to the new practitioner. The same procedure applies in the event that the worker takes up a position with another employer and the practitioner responsible for medical surveillance changes at this time.

It is generally expedient to include the medical record in the individual occupational health record of the worker concerned. The information in the medical record can be disclosed to STUK without the consent of the worker. The responsible party causing exposure to radiation can be disclosed information that the responsible party needs to fulfill the obligations laid down in the Radiation Act.

*The creation of the medical record, updates thereto, storage, disclosure of information therein and transfer of the record to a new medical practitioner when the current medical practitioner changes is governed by provisions 34 a and 34 b of the Radiation Act.*

5.6 **A medical certificate is issued for a medical examination**

On the basis of the pre-employment examination, the medical practitioner responsible for medical surveillance shall issue a statement on the employee’s fitness for work using the form shown in Appendix C or another form that contains the same information. Such a form could be, for example, Form 105 of the Finnish Association of Occupational Health Physicians, Statement on Health Examination B. In accordance with Appendix B, the certificate shall state the nature of the radiation work, the fitness of the worker to serve as a category A worker, and any restrictions
pertaining to the work.

The worker shall be given upon request the statement on the fitness for category A issued by the medical practitioner responsible for medical surveillance. If the responsible party reassigns the worker from category A work to other duties for health reasons, the worker shall also be given, upon request, a written certificate attesting to the said reassignment. A worker who is dissatisfied with such a decision is entitled to submit the matter for reconsideration by STUK. The responsible party must notify the worker of this right. The worker is legally entitled to obtain information about his/her health.

A worker who enters the service of another employer as a category A worker will need a certificate of fitness to serve as a worker engaged in radiation work and of the medical examination that has been performed. The said certificate will also be required when the worker begins service as an outside worker assigned to radiation work that has been commissioned by the responsible party (see item 3.3 of this ST Guide). The practitioner responsible for medical surveillance is required to issue a certificate based on the medical record.

The worker’s rights to obtain information on his/her fitness for category A and on his/her right to protest an assignment to other duties due to the status of his/her health are governed by the provisions in section 33 b of the Radiation Act. The worker’s rights to obtain details of his/her state of health are governed by section 5 of the Act on the Status and Rights of Patients (785/1992).

6 Pre-employment examination of category B workers

Although category B radiation workers must undergo a pre-employment examination, there is no need to subject them to periodic health reviews on radiation protection grounds. Should factors other than ionizing radiation affect the need for health reviews, the need for regular health monitoring must be considered on the basis of the workplace investigation.

The pre-employment examination of a category B radiation worker may, when necessary, include the same matters as in the pre-employment examination of a category A radiation worker (see item 5.1). Efforts must be made to arrange the pre-employment examination before the date on which the work commences, and the examination must be performed no later than one month after the said date.

The Radiation Act imposes no special requirements on the qualifications of the medical practitioner who performs the pre-employment examination of a category B worker.

Provisions for determining a special risk of illness and the need for medical examinations are laid down in section 3 of the Government Decree on medical examinations in work that presents a special risk of illness (1485/2001).

7 Matters to take into account when working abroad

When working abroad, medical surveillance is to be arranged in the manner approved by the state in question.

If the employer of a Finnish worker working abroad is also Finnish, the said employer must make sure that medical surveillance is properly arranged.

A worker going abroad to conduct radiation work needs the data on his/her radiation exposure to report it to the foreign employer. A radiation passbook is used for reporting the data agreed within EU countries. The Finnish radiation passbook consists of an individual radiological monitoring document and a certificate issued by the medical practitioner responsible for medical surveillance (see Appendix C). The individual radiological monitoring document is ordered from STUK. It can be ordered by the employer of the worker who is going abroad to conduct radiation work, or by the employee himself/herself.

The radiation passbook and working abroad are discussed in more detail in Guide ST 7.4.
Bibliography


APPENDIX A

Definitions

Radiation work
Work involving exposure to ionizing radiation in which the worker's radiation exposure may exceed any of the dose limits prescribed for members of the public in the Radiation Decree.

Worker engaged in radiation work
A worker engaged in work that is classified as radiation work.

Category A worker
A worker engaged in radiation work whose effective dose caused by the work exceeds, or may exceed, 6 mSv per year, allowing for the possibility of a work-related incident resulting in abnormal exposure to radiation, or the equivalent dose to the lens of the eye, skin and hands or feet is or may be greater than three-tenths of the dose limits prescribed for them in the Radiation Decree.

Category B worker
A worker engaged in radiation work who does not classified as category A workers.

Practitioner responsible for medical surveillance
A medical practitioner appointed by the party running a radiation practice (the responsible party) for the purpose of medical surveillance of category A workers, whose qualifications for serving in the said capacity have been recognized by a competent authority.

Further information: All practitioners performing medical surveillance of category A workers must be recognized by a competent authority.

Medical record
A record established and maintained for the purpose of monitoring the state of health of a category A worker by a practitioner responsible for medical surveillance.

Outside worker
A worker, student, apprentice or self-employed person who takes part in the radiation work assigned by the responsible party but is not employed by the responsible party.

Outside undertaking
The employer of outside workers or a self-employed person.
APPENDIX B

Instructions for assessing a worker’s fitness for radiation work

1 General requirements

From the point of view radiation protection the most important factors are radiation safe work methods, trained staff and appropriate equipment and premises, and not so much the fact that radiation workers are subjected to health requirements.

All workers engaged in radiation work must be capable of understanding the significance of the risks that are involved in their work and of complying with guidelines issued to minimize these risks. Workers must be able to work responsibly, independently and prudently. Workers must not be particularly prone to sudden and severe bouts of illness, and they must be both physically and mentally fit for the duties in question. When assessing the significance of proneness to bouts of illness, such as epileptic seizures, the permission to drive a car can be used as a criterion in some cases. If the proneness is not considered a ground for prohibiting the person from driving a car, it does not usually pose an obstacle to radiation work.

A worker engaged in radiation work must be at least 18 years of age. Persons younger than this may participate in the use of radiation sources insofar as this is necessary for their vocational training. However, persons under 16 years of age may not participate in the use of radiation sources.

Age limits for radiation work are laid down in section 37 of the Radiation Act.

2 A worker is exposed only to external radiation

Besides the general requirements specified in chapter 1 of this Appendix, there are usually no further health requirements governing duties in which the worker may be exposed only to external radiation. The ability to work responsibly and prudently becomes increasingly important with higher activity radiation sources and the higher dose rates that these produce.

Duties in which the worker may be exposed only to external radiation include:
- use of X-ray equipment
- use of sealed sources and equipment containing such sources
- use of accelerators not involving the manufacture of radioactive substances
- installation, repair and servicing of radiation equipment.

3 A worker is exposed both to external and internal radiation

When assessing a person’s fitness for duties that, in addition to exposure to external radiation, may involve contamination through the skin or mouth without significant exposure through the respiratory tract to radioactive particles or gases (see chapter 4 of this Appendix), attention should be paid to the following matters:
- severe skin diseases; the risk of internal contamination through the skin is considerably increased if the skin is damaged
- the skin must tolerate decontamination measures in the event of contamination
- hypersensitivity must not prevent the use of necessary protective equipment.
- breast-feeding.

Duties of this kind include:
- use of accelerators when handling activated materials
- use of unsealed sources, excluding the radioactive substances referred to in chapter 4 of this Appendix
- most servicing and repair work within the controlled area of a nuclear power plant
- servicing work involving the handling of activated or contaminated equipment components or sealed sources that have been damaged.

A mild rash on the hands will not prevent work when the risk of skin contamination is minor and the worker can use safety gloves. In work involving a risk of internal contamination attention should be paid to the worker’s renal
function, as impaired renal function may retard the elimination of contaminating nuclides from the body. The worker must also be encouraged to report if she is breast-feeding a child. In case of internal contamination, radioactive substances may end up in the child’s body through breast milk.

4 The work involves a significant risk of contamination through the respiratory tract

In duties that may, in addition to other exposure, involve significant exposure to radioactive particles or gases through the respiratory tract, attention must be paid not only to the foregoing aspects, but also, according to the character of the work, to the worker’s respiratory function. The use of heavy-duty protective gear and respiratory filters for certain demanding servicing duties performed within the controlled area of a nuclear power plant also require normal pulmonary and cardiac function of worker. It may also be necessary to use respiratory filters for short periods in radionuclide laboratories.

Duties of this kind include:

• manufacturing radioactive substances and handling unsealed sources when the radioactive substance is in gaseous, highly volatile or powdered form, and the activity of the radioactive substance handled on any occasion is greater than 100 times the exemption value

• any servicing work performed in the controlled area of a nuclear power plant where the risk of internal contamination is high.

With respect to radon and other naturally occurring radioactive substances, STUK will issue a separate order in each case where medical surveillance of workers must be arranged in accordance with the principles governing the use of radiation.

*Exemption values are discussed in Guide ST 1.5.*
APPENDIX C

FORM: Health review medical certificate
**HEALTH REVIEW MEDICAL CERTIFICATE**

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**Statement**

Medical fitness of examinee for service as a category A worker:

□ fit

□ fit on the following conditions:

The worker may not be exposed at work to the following substances or work in the following conditions:

□ unfit

Place and date Signature and sickness insurance stamp of certificate provider

*) Decision of the competent authority recognizing a medical practitioner to serve as a practitioner responsible for medical surveillance of category A workers.