3rd July 2015

Thank you for the opportunity to provide feedback on the various guidance documents from WorkSafe NZ relating to isocyanates and lead-based paints.

Background

The Health and Safety Association of New Zealand (HASANZ) is the umbrella organisation for workplace health and safety professions in New Zealand. It is an incorporated society that was launched on 10 September 2014. HASANZ represents 10 diverse organisations with a shared purpose – to raise professional standards to provide healthier and safer workplaces for New Zealanders. We promote excellence in workplace health and safety practice.

Our founding member organisations include:

- Australian/New Zealand Society of Occupational Medicine (ANZSOM)
- Human Factors and Ergonomics Society of New Zealand (HFESNZ)
- Maintenance Engineers Society of New Zealand (MESNZ)
- NZ Institute of Hazardous Substances Management (NZIHSM)
- New Zealand Institute of Safety Management (NZISM)
- NZ Occupational Health Nurses Association (NZOHNA)
- NZ Occupational Hygiene Society (NZOHS)
- New Zealand Safety Council (NZSC)
- Physiotherapy New Zealand (Occupational Group) (PNZ)
- Occupational Therapy New Zealand (OTNZ).

In relation to the guidance documents listed on your request for feedback, most of the answers to WorkSafe's questions are the same for each document; therefore, we will be making general comment only, and making reference to specific guidance documents by exception.

Are the documents used by HASANZ members and how often?

The HASANZ members that tend to use these documents, or would if they were up to date with current practice, include:

- Occupational health nurses – to inform their practice and to help them inform businesses that they come into contact with about the risks when staff are using these products and what appropriate health monitoring to put in place;
- Occupational hygienists – to inform their practice and to direct industry to a source of information about the risks of using these products;
- Hazardous substance specialists – to help them inform businesses that they come into contact with about the risks when staff are using these products, what mitigations can be

used, and what expert assistance to seek in relation to health monitoring and exposure measurement; and

- Health and safety generalists – to help them inform businesses that they come into contact with about the risks when staff are using these products, what range of general mitigations may be appropriate, and what expert assistance should be sought in relation to controls, health monitoring and exposure measurement.

At present, these documents are not referred to regularly because the information in them is out of date. Our members use more recent publications in other jurisdictions, for example the UK[1], in order to get the advice they need. If the information were kept up to date, our members would expect to use them more often.

Do the documents still reflect good practice?

In short, no, the information about practice is outdated. For example, reference is made in the approved code of practice for isocyanates to the following: "gas respirators must be stored in sealed airtight containers or plastic bags to prevent the filters from deteriorating due to exposure to traces of fumes present". This is poor practice as respirators should be stored outside the area of contamination so that personnel can don the PPE before entering the contaminated area. The documents also do not reference the requirement to keep training records.

We note that the section on down-draft booths[2] contradicts the New Zealand standard that covers this subject; for example, the approved code of practice for isocyanates states a minimum of 0.20 $m.s^{-1}$ but AS/NZS 4114:2003 has 0.25$m.s^{-1}$ as a minimum average downward air movement for the same system.

The basics for health monitoring in the documents does reflect good practice but this needs to be updated so it is referenced by both nurses and business.

We recommend you contact the Collision Repair Association to obtain information on industry good practice in the use of isocyanates. We understand that the concentration levels of isocyanates used in spray painting have changed considerably since the ACOP was published – concentration levels are now down to around 1 or 2% rather than the 10% that was prevalent at the time.

Other comments

We have a number of other comments in relation to these guidance documents that we trust WorkSafe will find helpful:

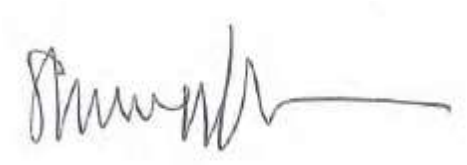
- We would suggest that WorkSafe reviews and updates all the documents listed. If a priority order is needed, we would recommend the update of the guides around the use of and monitoring of the effects of isocyanates is carried out first. We also recommend that the use of isocyanates in painting should be covered first in the relevant guidance document as this is the most common usage.
- Once the full suite of guidance documents has been updated, we suggest that WorkSafe issues updates to these documents in the same way that changes to regulations are made – don't incur the time and expense of re-doing the whole document regularly – issue updates

[1] Our members tend to refer to the HSE and NIOSH websites for this information.
[2] P38 of *Approved Code of Practice for the safe use of isocyanates.*

to these documents that should be read in conjunction with the original. When too many updates make it difficult to handle, issue a re-print with all the changes included.

- We recommend that the documentation consider the needs of the small business owner/operator; this type of business is common in New Zealand and it does not appear to feature in the current version of the documents.
- We would encourage WorkSafe to make use of video clips where necessary to support the documentation – our members have found these a useful way of getting key messages across to businesses when they have been available in other areas.
- We recommend WorkSafe makes the information in the documents generic and relevant to any industry, and then have stand-alone short guides or leaflets (only a couple of pages) for specific industries. We would recommend these are produced in conjunction with the relevant industry trade association in order to obtain up to date information on current industry good practice.
- We note that isocyanate-based products are used in other industries and not just in spray painting or foam manufacturing; e.g. it can be used in the printing industry's laminating process and is a common ingredient in adhesives. The guidance documents need to take account of these varied uses.
- The guidelines for the management of lead-based paints need to be widened to cover the more generic use of lead in manufacturing processes, not just paints, for example, brass manufacture and the manufacture of batteries.

Thank you for the opportunity to provide feedback. Should you have any questions in relation to the content of this document, please contact Karen Chaney at info@hasanz.org.nz.



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