



SUBMISSION FORM

The Department of Labour has prepared a draft Occupational Health Action Plan and is seeking feedback from stakeholders. In particular, we want to know:

1. In general – what you think about the plan – whether it is clear and contains accurate information.
2. For Section 2 Priority Areas of Focus, whether there are specific substances, processes or industries associated with the five health hazards that you think should be singled out for immediate attention, and why.
3. The actions you, or the organisation you represent, are prepared to contribute under the priority areas over the next 2 years and beyond, that can be included in the final plan.

The effectiveness of the action plan in improving the occupational health of workers is completely dependent on a range of stakeholders – both industry and government – making a commitment to take action in the priority areas. That's why we need your input.

Please complete this form and return it by post or email to:

Occupational Health Action Plan
Workplace Health and Safety Policy
Department of Labour
PO Box 3705
WELLINGTON 6011
Email: whss@dol.govt.nz

Responses are due by **5pm Friday 18 November 2011.**

Your details:

Name: Derek Miller

Position: New Zealand Occupational
Hygiene Society – Vice President

Address: 5 Van Dyke Place, West Harbour,
Auckland 0618

Email (optional): derek.miller@nzdf.mil.nz

Daytime Phone (optional): 09 417 7736

Publication Title: Occupational Health Action Plan

I am responding:

- as an individual. I am
- an employee
- an employer
- an academic researcher
 - a medical professional (please specify) _____
 - an Occupational Health and Safety consultant
 - Other (please specify) _____

On behalf of a

- Union (please specify) _____
- Business or employer organisation (please specify) _____
- Medical or health related organisation (please specify) NZOHS (NZ Occupational Hygiene Society)

PART ONE: General feedback about the document

Page	Section	Feedback	Reason
3/ALL	1/ALL	The identification and initiation of ways to reduce and manage health risks in the workplace is fully supported by the NZOHS.	There has appeared to have been a lack/drop of focus on health risks in the workplace for a number of years with the main focus being placed on purely safety issues. It is good to see a refocusing of issues that show that both Health and Safety are important.
4	1	The statement at the end of the section "Under the HSE Act, employers are required to monitor and assess exposures" is not strictly true. Employers are required "to monitor employee's exposure to the hazard" (not to assess). This can be (and is often) interpreted in different ways.	It is believed that there is a lack of requirement for the assessment and evaluation of "health" risks. This appears to be due to a misinterpretation of the definition of the words "monitoring of exposure", which can lead to a significant misunderstanding of the intended requirement of the legislation. In the experience of some NZOHS members, a number of companies do not understand that they are supposed to evaluate the exposure to hazardous substances that may cause health risks in the workplace. In some cases cited monitoring has been interpreted as simply observing exposure levels without quantifying the risks.
6 - 9	2	The title of "Respiratory hazards" can be misleading in that the definition given does not include other major effects of the respiratory route eg inhalation of solvents which will affect the CNS. A better name would be COPD's if only aimed at the areas mentioned in the document. Ideally this definition should be expanded to include other major respiratory hazards.	It is felt that solvents and other CNS depressants are key occupational hazards in NZ and should either be included in this area or mentioned as an area that would be looked at later. This will help ensure that persons do not neglect other areas of respiratory hazards. These substances are very common and used in very significant quantities (from fuel, paint strippers through to MEK, some inks etc). Official reporting of effects appears to be very low but anecdotal evidence from members is that this is a high risk area. In addition, these can have effects on the Psycho-social issues

Page	Section	Feedback	Reason
			<p>in regard to their synergistic effects with alcohol as well as their health effects which can include suicide, depression or other long term health effects. These effects not only affect the individual but can affect their families leading to higher costs to DHB's etc. As these solvents are widely used in many of NZ's industries (eg film set building, chemical, car repairs, boat building etc) it is felt by the society that this area should be included under Respiratory hazards.</p> <p>Exposure to sensitisers and a lack of understanding regarding their impact is also apparent during our work with industry. HSNO classes 6.5 A and B (respiratory and skin sensitisers) and many substances are both.</p>
6/7	2.1	In order to reduce exposures to the 5 specific hazards identified in this section, competence, expertise and experience in anticipating, recognizing, evaluating and controlling health hazards in the working environment are essential.	The NZOHS sees a key role for the discipline of Occupational Hygiene in reducing these exposures.
9	2.1.5	The work related psycho-social harm definition of "A range of workplace factors may contribute to psycho-social health outcomes" should be extended to include the home.	Reports from the ILO and other international institutions all indicate that there are significant factors where workplace psycho-social problems can affect families leading to higher costs to DHB's, affect schooling of children etc or vice versa. It is felt that this subject cannot be looked at in isolation as either a workplace or home factor as they are intertwined.
10	2.2	The NZOHS agrees with these statements and recognises this as a priority area.	The need for further establishment of professionalism within health and safety service providers is agreed and the NZOHS, through its members, can help in providing input suggestions on ways to develop/improve the future training and skills in occupational hygiene as required.

Page	Section	Feedback	Reason
10	2.2	The NZOHS supports the statements about the lack of both entry requirements and robust data on the number of people working in the field.	It is important that businesses, particularly SME's, know that the advice they are getting is reliable.
10	2.3	The Occupational Hygienists should be added to professional groups mentioned in this section under Occupational Health.	Although a part of the OHSIG, the role of the Occupational Hygienists is internationally recognized not only as part of the complete Occupational Health package but as an independent discipline, distinct from Occupational Medicine (i.e. Occupational Physicians and Nurses).
13	3.5	This professionalising of Occupational Hygiene is fully supported by the NZOHS	It is important that businesses know that the advice they are getting is reliable.
13/14	3.7	This is fully supported by the NZOHS	The area of research is vital in order that the often limited resources in business can be targeted to the areas of greatest effect.
14	3.8	This is fully supported by the NZOHS	The members of the NZOHS have a wide array of knowledge in monitoring workplaces. Therefore the NZOHS would be able to assist the Department of Labour in providing technical assistance to the Department through its membership as required.

PART TWO: Reducing exposure to known health hazards

Health hazards	Specific substances, processes or industries that should be given priority attention	What should be done	Why?
Occupational Carcinogens		General for all health hazards – The development of a New Zealand centric Control Band system	This would allow the greatest risks in each area to be quickly identified and targeted for monitoring and control.
Respiratory Hazards			
Noise			
Skin Irritants			
Psycho-social hazards			
Other ☺			

PART THREE: Actions being taken by you/your organisation between 2011 and 2013 that contribute to the priority areas of the plan

We need to hear about any actions or initiatives (planned or underway) that you or your organisation can contribute towards the priority areas of focus in the Occupational Health Plan *over the next two years* –

- reducing exposure to five occupational health hazards (occupational carcinogens, respiratory hazards, noise, skin irritants, and psycho-social hazards)
- developing New Zealand's capability to address occupational health issues, and
- building relationships between government, industry, and occupational health researchers and practitioners to work in partnership to improve occupational health.

Don't worry too much about the format of the information you provide at this stage – we will contact you to clarify anything else we need, and to make sure we have accurately reflected your activities when we prepare the final plan.

General description of action – who's going to do what, and when

NZOHS would like to be involved in the planning and implementation of the occupational health action plan. Our members work in the assessment and control of exposure and other occupational hygiene areas which could be used to help further the understanding of the potential risks. Therefore, the Society would be able to assist the Department of Labour in providing technical assistance through its membership.

The NZOHS would be pleased to comment at any time on policies, plans, programmes and initiatives developed by government agencies, industry and tertiary education institutions in relation to research and practice in occupational hygiene.

NZOHS has recently discussed, internally, working towards clearer qualification/certification pathways to becoming an occupational hygienist. This is in part to increase the capability of the profession and also to address the shortage of practising occupational hygienists.

Therefore, in the development of training and competency in Occupational Hygiene, and building the long term sustainability of the profession and professional services offered to the businesses of New Zealand, the NZOHS is particularly keen to work formally with the Department of Labour in developing their profession (e.g., through training, processes for certification, maintenance of competency etc).

To this end the NZOHS are willing to work with the Department of Labour, industry, Universities and other tertiary education providers in reviewing and developing competency standards for occupational hygienists. This could potentially be done initially by:-

- the preparation of a report for the Department of Labour into the current status of occupational hygiene education and training in New Zealand
- a review of the international education/training programmes available
- the provision of recommendations for competency standards and the development of long term solutions to the issues.

The NZOHS is currently increasing its formal links with internationally accredited, occupational

General description of action – who's going to do what, and when

hygiene sister organisations through:

- International Partnership system with the British Occupational Hygiene Society and
- soon to be held talks with the Australian Institute of Occupational Hygienists.