Requirements for golf clubs and greenkeepers

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The Control of Substances Hazardous to Health Regulations (C.O.S.H.H.) regulations originally came into force on 1 January 1988. Since then several amendments have been introduced until today the Control of Substances Hazardous to Health (Amendment) Regulations 1996. The COSHH regulations seek to control exposure to hazardous substances which arise out of or in connection with work which is under the employers control.

So what is a hazardous substance? To be subject to the COSHH regulations a hazardous substance must arise out of or in connection with work which is under the employers control. The substance can be solid, liquid, gas, fume, vapour or a micro-organism and can endanger health by being absorbed or injected, through the skin or mucous membranes, inhaled or ingested.

Substances listed in the regulations as being hazardous to health are:

- All substances listed as very toxic, toxic, harmful, corrosive or irritant.
- All those substances for which the Health and Safety Commission has approved an Occupational Exposure Standard (OES).
- A substantial concentration of dust of any kind.
- Any micro-organism which can cause illness.
- Any other substance which is not listed in any of the above categories but which has similar potential effects.

As we can see from the above the COSHH regulations apply to all hazardous substances with the exception of:

- Lead – so far as the Control of Lead at Work Regulations 1980 apply.
- Asbestos – so far as the Control of Asbestos at Work regulations 1987 apply.
- Substances which are only hazardous because of one or any combination of the following – radio-activity, explosive properties, flammable properties, high pressure, high or low temperature.
- Substances administered as part of a medical treatment or in the course of research.
- Substances found below ground in a mine.
- Micro-organisms which do not arise out of or in connection with work which is under the employer’s control (respiratory infections caught incidentally from fellow employees)
- Asphyxiants – these must purely be asphyxiants and non-toxic.

We have so far looked at what constitutes a hazardous substance. Now let’s look at what the regulations say we must do.

Regulation 6 – An employer must make a suitable and sufficient assessment of the risks associated with hazardous substances connected with work under his control and review the assessment when necessary. The employer must also inform employees of the assessment and keep written records of all but the simplest assessments.

To comply with this we need firstly to list all the substances we have on site. We need then to ensure that we go on and carry out our assessment. This must take into account - the substances that we use; the way in which we use these substances; who uses these substances or could come into contact with them; where we use these substances; what safety precautions we are taking when using these substances and how we sort and dispose of substances and packaging after use.

Next month we will look at how actually to carry out an assessment as required by the COSHH Regulations.

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