



Ask any greenkeeper which single subject concerns him most and the likely answer will be COSHH. Government regulations are often couched in a language that is hard to understand and it is no secret that greenkeepers and club officials are often puzzled by the predominance of 'technobabble' favoured by those boffins of officialdom. **JON ALLBUTT**, an acknowledged leader in the field of training in safety awareness and pesticide usage, disentangles some of the mysteries...

The Control of Substances Hazardous to Health Regulations 1988 are made under Section 16 of the Health and Safety at Work Act 1974 and require that from January 1st 1990 "An employer shall not carry on any work which is liable to expose any employee to any substance hazardous to health unless he has made a suitable and sufficient assessment of the risks". All very well so far, but what is a substance hazardous to health? The Regulations define it as:

- (a) A substance which is listed in Part 1A of the Approved List as dangerous for supply within the meaning of the Classification, Packaging and Labelling (of Dangerous Goods) Regulations 1984, and for which the general indication of nature of risk is specified as: very toxic, toxic, harmful, corrosive, flammable or irritant.
- (b) A substance for which a maximum exposure limit is specified in Schedule 1 or for which the Health and Safety Commission has approved an occupational exposure hazard.
- (c) A micro-organism which creates a hazard to the health of any person.
- (d) Dust of any kind, when present at a substantial quantity in air.
- (e) A substance, not being a substance mentioned on Sub-Paragraphs (a) to (d) above which is comparable with the hazards created by substances mentioned in those sub-paragraphs.

As definitions go it is very comprehensive, and confusing, but what does it mean? To understand it better we need to look at each section in more detail:

- (a) The Packaging Regulations set a standard approach to the packaging of substances that have their nature of toxicity clearly defined in the reference book. THE PROBLEM IS THAT MOST PEOPLE HAVE NEVER SEEN



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Life under the

THIS BOOK, WHICH COSTS £10.00 AND IS UPDATED EVERY YEAR! For many of the products we use it may be an individual ingredient in the product that gives it the hazardous classification, making the problem more complicated as some products may not have all the individual ingredients on the label. So, in addition to the label, we need to refer to the product Safety Data Sheet for the additional information. Manufacturers and / or suppliers are required to supply Safety Data Sheets at the time of delivery. The Safety Data Sheet will list any ingredients in the product that are classified as hazardous under these regulations.

(b) The Health and Safety Executive Guidance Note EH40/91 sets out the lists of the substances and their exposure limits. The limits are very technical, being based on short term exposure limits (STEL) or long term exposure limits (LTEL) of concentrations in the air measured in milligrams per cubic metre (mg / m³). These limits become important especially where staff are working in confined spaces with poor ventilation. Where staff are in regular contact with products containing substances listed in EH40/91, it is a good idea to arrange for experts to assess whether the degree of exposure approaches or exceeds the limits. While there is a low risk of such exposure when working outside, there can be problems in workshops using aerosols, some paints, paint strippers etc.

(c) Micro-organisms are a worry, as they can't be seen and easily identified; for example there are risks of infection from Tetanus and also from Weils Disease in rat infested water. The employer is required to be aware of the risks of infection from micro-organism and to take steps to ensure that there is a safe system for working in place to avoid such risks. The employee must also observe strict personal hygiene at work and take care of any personal protective equipment that is issued.

(d) A substantial quantity of dust is classified as a concentration of 10 mg/m³ over an 8 hour time weighted average (LTEL) of total inhalable dust; or 5 mg/m³ of respirable dust in the same period. These are strict limits that require special equipment to assess the concentrations of dust in the atmosphere. Mixing top dressings or handling bags of dusty fertilisers in confined spaces over this period might require that the dust levels be measured.

(e) This is the clever one! "Any substance used at work which does not fit the other categories but is comparable in terms of the hazard it represents". How do you decide? This section of the definition allows for any new substance that comes along or any existing substance that does not fit the other definitions. The label and safety data sheet will probably give enough information to enable the employer to decide if there is a hazard comparable with any of the above sections. It may be necessary to call in an expert if there is ANY doubt.

On top of the difficulty of understanding the definitions, it must also be

C O S H H

remembered that any risk assessments must be "suitable and sufficient". It may only emerge that the assessments are suitable, or not, following a visit from the Inspector. It is essential therefore that a start is made without delay as Inspectors are unlikely to be sympathetic to those who have buried their heads in the sand! So how do we make a start?

- (1) Make a list of all substances on the premises; make sure to note amounts and, if possible, how old they are. Remember that all substances may be subject to the Regulations, including cleaning materials, fuels, lubricants and pesticides.
- (2) Ask all staff to justify their needs for these substances. Are they old stock and no longer required? Sort out the unwanted stock and obtain quotes for safe and proper disposal.
- (3) Contact the suppliers and request Safety Data Sheets for ALL remaining products on the inventory. Inform the suppliers that future deliveries may be refused if they arrive without the Safety Data Sheets; as this is required under Section 6 of the Health and Safety at Work Act.
- (4) Sort out the inventory into classified and unclassified products.

You may be surprised to see, for example, that even some wetting agents are classified as Irritating To Eyes.

(5) Now investigate the use of the classified substances. How frequently are operators exposed to them, how do they actually use them and what training have they received? Some pesticides that are classified as Harmful may only be used twice a year, but diesel fuel, which is also classified as Harmful, is probably used every day.

(6) Write down the risk assessment for each substance. This may involve a decision to change to a less harmful but equally effective alternative; for example, there are non-flammable aerosols available. It may also state that in future a particular substance is to be used in a particular way, or may not be used without prior permission. There may also be a need to write a safe operating procedure for some products, e.g. the use of lavatory de-scalers or drain cleaners.

(7) Identify where there is need for staff training and arrange a training programme. This can be done in the form of a short period of instruction at work or by attendance at a local college. It is important to keep a note of all training carried out for this could become vital documentation should an accident occur at a later date at the workplace.

(8) Finally, make sure all staff are made aware of the risk assessment decisions and make a note of the review date, say in a years time.

It will never be possible to be completely up to date, for there will be changes of product and work practices throughout the year and this fact is accepted. However there is no excuse for being unaware of what is in use and how it is being used.

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