

Under the COSHH

More words of wisdom on health and safety matters by Jon Allbutt

The Control of Substances Hazardous to Health Regulations were introduced originally in 1988 and have been progressively revised since then. The most significant revision came in 1994 with some changes in definitions and important additions, but more about that later on. When trying to understand new health and safety regulations it is not a bad idea to ask the question why?; Why was it necessary to introduce a special set of regulations under the Health and Safety at Work Act that deal specifically with hazardous substances? The Control of Pesticides Regulations were introduced in 1996 along with a handful of Codes of Practice so the problems of use and exposure to pesticides were being taken care of, or were they? But, there are many other substances hazardous to health to which we are exposed more frequently than pesticides, and these are not subject to the same testing, registration, labelling and use restrictions as pesticides.

The employers general duties set out in Section 2 of the Health and Safety at Work Act 1974 do not give details on the specific matter of hazardous substances. There are no definitions, no specific duties with regard to protection, monitoring, risk assessments etc.

So there is a need to raise awareness of the risks to health, both short and long term from exposure to hazardous substances. We need an action plan to avoid and/or minimise exposure and a system for recording, informing and monitoring all work activities involving these substances. That in a nutshell summarises the employers duties as required by COSHH Regulations. The wording of Regulation 6 is interesting:

"An employer shall not carry on any work which is liable to expose any employees to any substance hazardous to health unless he has made a suitable and sufficient assessment of the risks created by that work to the health of those employees and of the steps that need to be taken to meet the requirements of these Regulations."

This vital point "shall not carry on any work" is missed by most employers; another vital point usually missed is the duty to assess "the risks created by that work". It is not sufficient to merely record what is being used; to complete a "suitable and sufficient" assessment there must be a study of the work done involving hazardous substances.

A classic example in greenkeeping is the use of diesel fuel. A typical material safety data sheet (MSDS) states clearly:

"The products are defatting agents and contain low concentrations of polycyclic aromatic hydrocarbons, some of which are known, from experimental studies, to be carcinogenic. Prolonged or repeated skin contact, and in condi-

tions of poor personal hygiene, may therefore cause dermatitis, and pose a possible long term risk from skin cancer."

Diesel fuel tanks or drums that have no proper means of dispensing except into a makeshift container which is then poured into the fuel tank involve unacceptable exposure during the fuelling of vehicles. Add the fact that this is an operation that takes place one of more times per day, and you have a situation that contravenes the requirements of Regulation 6.

So how can we deal with this situation? The diesel tank will be raised on piers within a bund, or be fitted with a pump. There will be a delivery hose long enough to reach, and designed to deliver fuel, without spilling(!), into a variety of types and sizes of fuel tank. The diesel storage tank will have the warning symbol (Harmful) and any guidance fixed near to the delivery hose and gloves of the correct type nearby for use on every occasion the fuel is dispensed.

I recently carried out a health and safety audit at a golf course and found an old diesel fuel tank sitting on some sleepers in the shed. It was just high enough off the ground to fit a bucket under the tap. The tap was leaking and the greenkeepers stood in a slurry of sand and diesel to fill the bucket which was then poured (mostly!) into the fuel tank of the vehicle. All the vehicles had the typical staining of spilt diesel, not to mention the characteristic smell!

ACTION PLAN

Here is a suggested action plan to take to the Greens Committee for adoption, to help the employer to comply with the COSHH Regulations:

1. Those members of the club management team to attend either the BIGGA Courses (see insert), or one of the British Safety Council Tel: 0181 741 1231 one day courses run throughout the year on Risk Assessment and General Health and Safety.
2. Make a complete list of all chemical substances in use for the whole site. Justify the list and dispose of all those substances that are no longer required; amend the list.
3. Set a policy that no new substances will be purchased by the Club until a Material Safety Data Sheet (MSDS) has been obtained first, studied and a decision made that it is not more, and preferably is a less hazardous substance than that previously used. Obtain Material Safety Data Sheets for all the substances on the list.
4. Complete a list of work activities likely to expose staff to micro-organisms and state how these risks can be eliminated, or reduced.
5. Make another list of those work activities involving exposure to dust and decide if expert help is needed to quantify the

The regulations make it clear that it is not only chemical substances that are hazardous, in fact the regulations also state:

"A biological agent", and gives this definition – "biological agent" means any micro-organism, cell culture, or human endoparasite, including any which have been genetically modified, which may cause any infection allergy, toxicity or otherwise create a risk to human health.

So here we need to be aware of the risks to health from a variety of organisms such as Tetanus, Leptospirosis, Legionella, Hepatitis and so on. All greenkeepers should have up to date protection against Tetanus and take care when working in or near rat infested water, or working with materials in rat infested areas e.g. plastic fertiliser bags. The revisions for the 1994 regulations include for the first time An Approved Code of Practice for the Control of Biological Agents and places additional duties on the employer to complete a risk assessment where exposure arises from a deliberate intention to work with a biological agent, or where exposure is incidental to the main work activity.

Another area often missed by the employer is "a dust of any kind when present at a substantial concentration in air". Mowing in drought conditions, mixing and applying top dressings or fertilisers are the sort of jobs that may expose staff to high concentrations of dust, sometimes for long periods.

degree of exposure. State how this exposure could be eliminated or reduced.

6. Review all personal protective equipment and establish whether it is adequate, up to date and carries the CE Mark. Remember you will need material safety data sheets for this equipment as well to establish its suitability.
7. Prepare risk assessments, where necessary, taking into account the degree of exposure and the actual work activity. Decide if the exposure can be reduced by changing the substance, or the method of working. If necessary prepare written guidance where staff need to follow specific procedures.
8. Put all of this into a Health and Safety File and present it to the appropriate Committee for adoption as part of the Club Health and Safety Policy.
9. Introduce it to all staff as part of a training session giving them enough time to become familiar with the File and their duties.
10. Monitor the use of the File on regular occasions during the first six months of use and report back to the Committee with recommendations for revisions.