

Neil Gibbons looks at the COSHH Assessments and how best to go about carrying them out

COSHH ASSESSMENTS



Introduction

The Control of Substances Hazardous to Health Regulations 1999 (COSHH for short) have been in existence for a long time but there is still, it seems to be, a serious lack of appreciation of what a so called COSHH assessment really means. This article is intended to give you the information to be able to carry out assessments correctly.

Not long ago I went into a company and, when I asked to see their COSHH Assessments, was proudly given a large file. However, when I examined it, it simply contained all the Safety Data Sheets. These are not assessments.

Making an Inventory

So how do you start to comply with COSHH? Well, you cannot do anything until you know what substances you have.

Therefore, an inventory of all the substances within the organisation is key. It is best to consider individual areas to ensure you are thorough i.e. Greenkeepers, Clubhouse (including bar), Pro-shop. You may be surprised to find how long the list is, but do try to make sure it is complete.

All substances in use by your organisation should have been supplied with a Material Safety Data Sheet. If you do not have one for each of the substances you use, contact your supplier (found by looking at the packaging), who is obliged to supply one.

Doing the Assessment

As I have said above merely having a list of substances you use and a file containing all the Material Safety Data Sheets does not constitute an assessment. The stages involved in an assessment are:

- Establish if the substances you use are hazardous and what is the type of hazard. The CHIP (Chemical Hazard Information and Packaging for Supply) Regulations define classifications for hazardous substances. The main classifications are harmful, irritant, corrosive, toxic, flammable, oxidising. The container for the substance will be labelled accordingly.

- Establish the approximate usage of the substance (e.g. kg or litres per week) along with the frequency (how often) and duration of use (minutes or hours?).

- Record how contact with the substance occurs and brief details on how and where it is used. For example with small quantities of paint it could be 'used externally for general painting' or when mixing chemicals for spraying 'mixed with water and then poured into spray unit tank. Process carried out on concrete area outside (or in well ventilated area).

- Record what control measures are used to avoid exposure to the substance. This could be an extraction system, the use of a pump to avoid contact, or most commonly the use of Personal Protective Equipment (e.g. safety spectacles or goggles, gloves, overalls, chemical suit, wellingtons).

It is only after recording all this information that an assessment can then be made, and I hope it is evident that you cannot make one without it, because the conclusion has to be the answer to the following question;

Is the exposure to this substance which is hazardous to health suitably controlled to avoid it being harmful to the employee (or anyone else likely to be exposed to it)?

If your assessment concludes that exposure is not likely to be harmful then that is as far as you need go. A record of this assessment needs to be kept along with a copy of the Material Safety Data Sheet.

Further Control Measures

If the assessment concludes that exposure is still potentially harmful you must consider additional control measures.

The COSHH Regulations, as with other risk assessment processes, lays down a hierarchy of control measures you must consider:

- Do you really need to use it or can it be replaced by something less hazardous?

- Can you reduce the usage of it by changing the process?

- Can exposure be reduced by introducing some form of mechanical exposure control or handling device (e.g. a pump)?

- Can ventilation be improved?

- Can you reduce the exposure by changing the process or how the substance is used (operating procedure)?

- Is additional or better Personal Protective Equipment required?

Monitoring

In my opinion one of the biggest problems in reaching a conclusion as to whether exposure is adequately controlled is that it is impossible to know the levels of the substance in the atmosphere without measuring it. Where exposure duration is short and infrequent it is unlikely exposure levels will be exceeded. However there is obviously a need to consider if monitoring is required. This needs to be carried out by a suitably qualified person and can involve monitoring of the workplace or personal monitoring.

It should also be noted that in certain cases involving the use of particularly hazardous substances (for example carcinogens) health surveillance of employees will be required

Conclusion

I hope I have demonstrated that there is far more to a COSHH Assessment than simply obtaining the Material Safety Data Sheet. However the main point is that you are conducting an assessment i.e. that you must reach a conclusion as to whether the control measures you have in place are suitable to control the risk of exposure.

For more information on COSHH or assistance with COSHH Assessments or indeed any Health and Safety problem please contact:

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