

HSE: De-regulation or revitalisation?

The UK's safety police, the Health and Safety Executive (HSE) has reached a fork in the road to its future.

Earlier this year the HSE's ruling body, the Health and Safety Commission (HSC), set a policy which follows a more business friendly de-regulatory path of less law enforcement of workplace safety laws and more advice and encouragement (see 'Sold out' below). But in July a government select committee in the Department of Work and Pensions (DWP) published its report on the HSC's and HSE's work saying the current path was the wrong one and more enforcement, not less, with more resources is what is needed. The DWP report recommends the government and HSE get back on track with the government's 'Revitalising health and safety' strategy which it published after wide consultation in 2000. The 'Revitalising' proposals called for a new safety bill dealing with crown immunity, increased penalties for safety crimes including imprisonment, rules covering all company directors etc.

Which argument will win out in the long term is the question being asked currently as the parliamentary committee has no power to force change, it can only make recommendations. The DWP can and should insist on changes following the line of the report. However, in the opposing corner, the chair of the HSC and person in overall control of the HSC/E, Bill Callaghan, has made it clear he does not see their recommendations as the way forward and will resist some if not most of the key findings such as extending safety reps' rights, a key finding of the DWP report.

HSC

The HSC under Callaghan's steerage has also failed to push the government's 'Revitalising' legislative agenda since its



PHOTO BY EYE BARKER

publication, focusing on trying to meet some fairly weak targets on accident and ill-health reduction which it openly admits it is unlikely to achieve. Callaghan was appointed chair of the HSC by government as a trade union appointee from the TUC, but has yet to show any real sympathy towards a trade union agenda for change. Much of the government's own 'Revitalising' strategy has been agreed at various union conferences and the TUC Congress but this has not been reflected to any real extent in HSC or HSE policy or action.

Callaghan has openly stated he is against extending safety reps' rights in law and in particular the right to issue Provisional Improvement Notices (PINs). Again this flies in the face of what the DWP, TUC and many others, say about roving safety reps and PINs. The DWP report states: 'Given the HSE's limited resources, if safety representatives were empowered to enforce health and safety law in the workplace, we believe this would have a powerful effect in improving standards. We also believe this power

to take action should include not just criminal prosecutions but also improvement and prohibition notices.'

De-regulation

De-regulation of health and safety laws can occur in many ways, the most straight forward being removing the legal force of safety laws and making them advisory, as was tried in the early 1990's. A sneakier way of de-regulating, which gives the impression of maintaining enforcement, might include restricting the activity and effectiveness of an enforcement agency by cutting or limiting its budget, weakening its guiding policy and then implementing it. And that is what's happening now as the combined effect of cuts in funding to HSE, shifts in policy by the HSC, changes to HSE enforcement policy and the potential shrinking even further of the role of HSE enforcement officers. The Centre for Corporate Accountability has analysed the policy and budgets of HSC/E and published its worrying findings on its web site (see below). The legality of some of the de-regulatory changes made by HSE recently is questionable, such as 'earned autonomy' i.e. letting 'better performing' companies off HSE enforcement activity.

Inspections

Current estimates are that workplaces are likely to see an HSE inspector once every 15-20 years, if at all. In April 2003 the trade union Prospect, one of the main unions for HSE workers, warned that cuts to HSE's budget would mean a reduction of around 50 inspectors out of about 700 field inspectors employed nationally. Prospect estimated this would mean at least 5,000 fewer workplace inspections per year. A year later the HSC finally admitted that cuts were having to be made and that with 698 inspectors

Continued on page 2, column 2

Turning against the big smoke

Nearly three quarters (74%) of Londoners would support a law to make all workplaces smoke free, according to the results of a web and phone survey commissioned by the London Health Commission.

Two thirds (63%) of those interviewed worked in offices and 5 per cent in places where people shop or eat. London's entertainment and retail industry exposes thousands of workers to tobacco smoke. Secondhand smoke is now the only proven human carcinogen that is unregulated in the workplace. Only half of workers are employed in smokefree workplaces and one in ten people work in places with no restrictions at all.

A draft Approved Code of Practice, which would have applied the Health and Safety at Work Act to smoking, has been stalled since consultation in 1999.

- ▲ More at www.bigsmokedebate.com
- ▲ Proposal For An Approved Code Of Practice On Passive Smoking At Work. CD151. www.hse.gov.uk/consult/condocs/cd151.htm

Continued from page 1

employed in 2003, recruitment would stop and those leaving employment would not be replaced. Prospect fears that with retirement and inspectors leaving their jobs the number of inspectors lost might be higher than 100, worse than previously thought.

The DWP report calls for a doubling of field inspectors. This flies in the face of the current HSC/E policy statement which doesn't call for more resources and which edges field inspectors' (our safety police force) increasingly away from inspections and enforcement. This is cutting back on the one thing the DWP report says is effective: 'inspection, backed by enforcement, is most effective in motivating duty holders to comply with their responsibilities under health and safety law.' The DWP committee calls for HSC to change its current strategy ('HSC: A strategy for workplace health and safety in Great Britain to 2010 and beyond' see references) to reflect that.

There is a pilot scheme in London and the north-west where new 'workplace compliance officers' are currently being tried out. Without the same amount of training or powers as HSE inspectors they are meant to assist them in their work and provide guidance to employers. Prospect is concerned these new officers will lead to a further watering down of site inspections and enforcement. Others believe money spent on these new officers could be spent on much needed fully qualified enforcement officers, especially in areas such as construction. The role of inspectors is also being undermined by restricting inspections to 'priority areas' and ignoring the rest and not investigating some major injuries.

Silent witness?

You would have thought that any opportunity to counter this very worrying outlook would be grasped with both hands, but no! Chair of HSC Bill Callaghan and HSE's Director General Tim Walker were called to give evidence to the DWP inquiry into health and safety in May. They were asked what might be done to improve their lot by the chair of the

committee, Sir Archie Kirkwood. There was no substantial answer given by either man. Again the chair tried to coax an answer, implying if anyone was going to be able to help argue for funds it was this committee. Again there was no strong case put for more funds, just a comment that strong applications had been made to ministers. The committee report expressly criticises HSC/E for not having any response on the question of extra resources.

An act of folly? Unlikely. What is more likely is that these two men are simply implementing a planned de-regulatory programme for the HSE. The evidence for this is in the HSC strategy document published in February 2004 which has provoked angry outcry since its publication (see 'Sold out' and 'HSC strategy' below).

Which route the HSC/E takes now depends on who will win the debates that are currently being held. But with Bill Callaghan's recent re-appointment as HSC's Chair it looks unlikely the DWP's agenda will be adopted unless pressure is brought to bear.

References

- ▲ Department of Work and Pensions Committee report: The work of the Health and Safety Commission and Executive: www.publications.parliament.uk/pa/cm200304/cmselect/cmworpen/456/45602.htm
- ▲ 'Sold out' on HSC policy, Hazards magazine: www.hazards.org/commissionimpossible/report.htm
- ▲ HSC: A strategy for workplace health and safety in Great Britain to 2010 and beyond www.hse.gov.uk/aboutus/hscstrategy.htm
- ▲ Centre for Corporate Accountability: www.corporateaccountability.org
- ▲ Revitalising health and safety: www.hse.gov.uk/revitalising/strategy.pdf

Construction death inquest

David Olusegun Ojewumi, aged 38, a Nigerian living in South London, was known as Sam. He fell to his death on 23rd May 2003, working on former council housing in Bethnal Green. No one saw how it happened.

Sam was finishing off some rendering on the inside of a parapet wall of a roof garden. The scaffolding was four lifts high. The bottom ladder was put away at night. On the day Sam fell there was a ladder on the first lift, lying covered in materials (noted as needing action at an inspection the previous day), but no ladder from the ground to the first lift.

It was thought that to get to the roof garden he went up using the stairs inside the building then out onto an unprotected canopy, then over the balcony, and that this was the way he was going back to get more render when he fell. Trevor Lloyd Warmington of Procontract Services Ltd, the director of the small firm he was directly employed by, must have missed the fall by minutes.

The HSE said they were satisfied there was a safe system in place for access/egress just that 'for some reason' it was not used on this occasion.

The principal contractor was Apollo London Ltd, who were the only party at the inquest represented by a solicitor. HSE verified all their paperwork was in order and Apollo had a signed bit of paper on file saying Sam had been given an induction. No evidence was given about the adequacy or appropriateness of this induction for someone whose first language was not

English. Sam was described as a labourer, although the Coroner impressed on the jury that he was much more skilled than that and was a 'concrete fixer'. There was no mention of a Construction Safety Certificate Scheme card.

The client was Tower Hamlets Community Housing set up in 1999 to enable the privatisation of 1552 homes. Subsequently the government provided £21 million from the Estate Renewal Challenge fund towards a £56 million estate regeneration programme. This is funding local authorities could not access for council housing improvements while they remained the landlord. Consequently they cannot and do not use their own highly skilled and invariably unionised workforce for such projects, assuming that they have not been privatised as well. However the question should be asked – if this work had been done by a local authority's DLO of unionised workers, would a labourer have been allowed to work up there in such a manner by themselves? There was no evidence of a union on the job.

If a construction roving safety rep existed, and they were able to investigate immediately, collecting evidence, would there be a different more complete story of David Ojewumi's death to tell?



The Construction Safety Campaign (CSC) protesting outside a construction site in Station Rd N22, where John Walsh, 40, from Potters Bar was killed when hit by a large object which fell from an excavator bucket while it was being moved. The client on the job is London Borough of Haringey and the principal contractor is Mount Anvil.

Evidently there were a lot of workers on the job that day, relatively speaking, but no one saw anything.

Verdict: misadventure

Recent London workplace deaths

- ▲ **20.7.04** Bill Faust, 36, and Adam Meere, 27, firefighters killed on a fire call in Bethnal Green.
- ▲ **4.7.04** Issiaka Salawu, 24, a student working as security, stabbed outside nightclub.
- ▲ **29.6.04** Tony Martin, 72, died in a fire at his vehicle repair garage in Teddington.
- ▲ **1.6.04** Sam Boothman, 32, crushed by a vehicle at World's End Waste, Battersea.
- ▲ **18.5.04** Robert Cherry, 59, crushed between two buses at Uxbridge bus depot. Employed by First Busses.
- ▲ **6.5.04** John Walsh, 40, hit on head on Mount Anvil construction site in Haringey.
- ▲ **25.4.04** Andrew Clack, 59, Electrocuted while attempting to assist children playing on a train at Stratford.
- ▲ **22.4.04** Gary Wells, 47, police officer on a training course, collapsed while doing a type of fitness test.
- ▲ **2.3.04** Keith Webb, drowned while working on a barge at the Tate and Lyle factory in Silvertown.
- ▲ **15.1.04** Patrick O'Sullivan, 54, hit by falling scaffold at the Wembley stadium construction site.

Fly-tipping to increase

The menace of illegally fly tipped hazardous waste is set to rise steeply as a result of new EU rules which came into force in July. Under these rules the number of landfill sites which can take hazardous waste will be drastically cut from approximately 250 to as few as 11, and the cost of disposing of hazardous waste is set to soar.

Environment Agency (EA) Officers will be kept busy conducting checks at sites which could formerly take hazardous waste under 'co disposal' of hazardous and non-hazardous waste arrangements which became illegal on 16 July 2004. The Officers will conduct spot checks on waste consignments as they arrive to ensure that only permitted waste is accepted. Loads which are rejected will be subject to strict scrutiny and the carriers will need to prove that they have contingency plans to dispose of hazardous waste at authorised sites.

EA Officers will also target known fly tipping hotspots to deter the temptation of the carriers and producers of hazardous waste to carry out illegal dumping. The EA has developed a web based information resource called 'Fly-catcher' which is to be used by the different agencies trying to catch the criminals involved in this problem.

In London in 2002/03, 4.4 million tonnes of municipal waste was produced, of which 3.4 million tonnes was from household sources. Greater London has a household recycling rate of 11%. Other figures include: Municipal Waste Recycled: 0.411 million tonnes (9%) Municipal Waste Incinerated: 0.873 million tonnes (20%) Municipal Waste sent to landfill: 3.163 million tonnes (71%).

Tyre waste

Another change after 16 July 2004 means vehicle tyres must be shredded before they are accepted at landfill sites. Few tyre retailers are aware of this requirement and it is feared that the amount of illegally dumped tyres will increase significantly. There are a number of secluded areas and lanes on the outskirts of London which are already notorious illegal tyre dumping sites.

The government has been aware of the new requirements since they were agreed by the EU in 1999. Despite this there seems to have been no effective planning to meet the new requirements and the arrangements for the disposal of hazardous waste throughout the UK appear to be in a state of dire crisis.

The new landfill laws are designed to reduce pollution, raise environmental standards and improve waste recycling.

Hazardous waste

The classification of 'hazardous waste' is given to many discarded household items such as old paint tins, batteries, TV sets, mobile phones, computers and monitors, domestic pesticides and herbicides etc as well as the huge range of waste residues generated by industry. Approximately 5 million tons of hazardous waste, which will have included asbestos and other seriously toxic substances, was disposed of in land fill sites in England and Wales during 2000. Nearly half of this was generated by the demolition and construction industries. As asbestos is regarded as chemically inert, it can be still be co-disposed of in 'non hazardous' land fill sites, but only if it is separated from other wastes which are regarded as 'reactive' and environmentally dangerous.

The new rules now require soils removed from brown field sites, and certain products from agriculture, to be classified as hazardous waste. Previously the majority of this material could be disposed of in most landfill sites but now must go to hazardous waste sites. This is a new requirement, which at current rates, is set to add almost one million tons of

extra hazardous waste to a problem which is expected to grow at a rate of 8% a year for the foreseeable future.

The increases in cost and the bureaucracy involved in the safe and responsible disposal of hazardous waste are likely to trigger a sharp rise in the incidence of fly tipping.

Court action

In recent months several high profile cases have been taken to court by the Environment Agency which demonstrated that acts of illegal dumping and fly tipping are carried out systematically by organised criminal gangs.

Under current Local Authority arrangements, small business undertakings such as plumbers, builders and kitchen fitters etc, whose work generates relatively small quantities of waste, are either completely barred from using civic amenity and domestic waste recycling centres, or they are charged heavily for the service. This has already led to an increase in minor incidents of fly tipping which are now likely to get out of hand. Most Local Authorities rely on the services of contractors to deal with minor fly tipping incidents. Under these arrangements contractors arrive at a reported fly tip carry out a clean up and the material is then disposed of at the community's expense. Inadequate resources allow for very little investigative work to be carried out, in order to determine the origin of the fly tipped waste and to hold the perpetrators to account. Very few small scale fly tippers are ever caught.

Resources

- ▲ Capital Waste Facts is dedicated to providing information about waste and recycling in London.
www.capitalwastefacts.com/
- ▲ Asbestos fly-tipping in London (Daily Hazard No. 78):
www.lhc.org.uk/members/pubs/newslet/78dha.htm

Rising from the dust

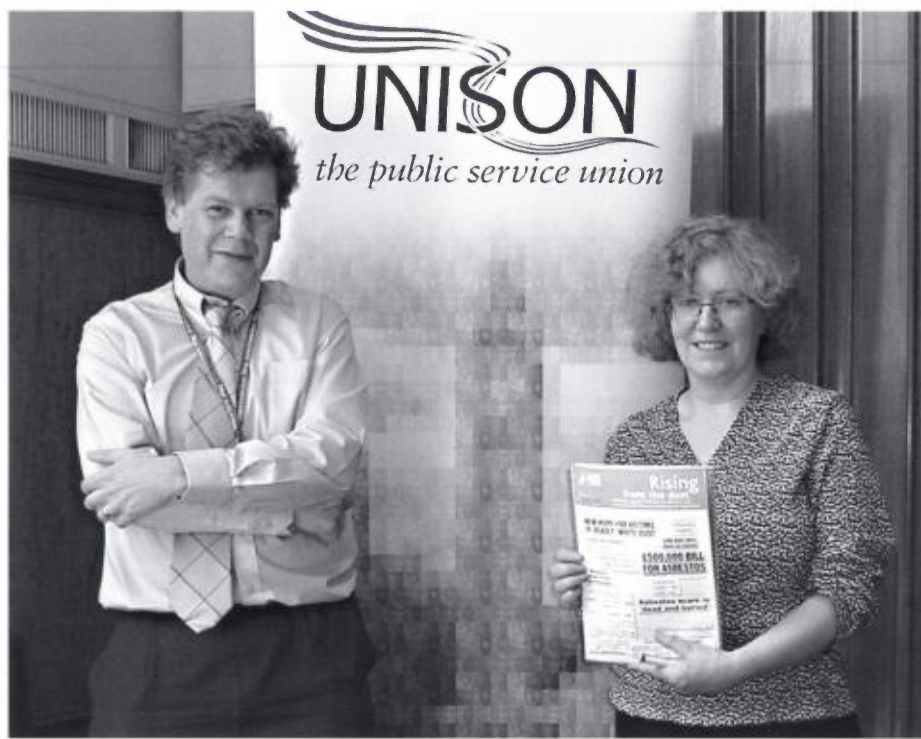
*The London Hazards Centre report **Rising from the Dust** was released at a public meeting held at Barking Town Hall in June 2004.*

The intention was to highlight some reasons why Barking and Dagenham, 'the sickest borough in London,' has the UK's highest incidence of female mesothelioma, the asbestos cancer, and the 10th highest, after shipbuilding regions, for males:

'The exceptionally high asbestos mortality rate in this part of London is a marker of how hard the area has been hit by the legacy of Cape Asbestos, the industrial killing machine that used to be in Harts Lane. The death rate for women from this cancer is usually six times less than men, with women suffering around 15% of the total number of deaths from mesothelioma every year. Women's asbestos exposure is often categorised as environmental exposure, including washing dusty overalls of men working with asbestos. But in the Harts Lane Cape factory women actually worked alongside men.'

Environmental exposure has been rife in the borough for decades. Fred Lodge died of mesothelioma aged 39; he had never worked with asbestos, but had the misfortune to live near the Cape factory. Despite the fact that the asbestos works are long gone, contamination of Cape's former site, on which a housing development was built, persists. In 1997, asbestos was dug up during construction work on the Harts Lane Estate.

At the launch the Barking and Dagenham UNISON branch announced they would fund the setting up of an asbestos support network organising drop in advice sessions in local community Centres, with London Hazards Centre providing assistance. UNISON branch chair Louise Couling explained that they would try to provide 'practical and emotional support for asbestos victims and their families, help raise public awareness of asbestos problems within



Report author and Centre Advice Worker, Margaret Sharkey with Barking and Dagenham Unison rep Tony Browne at the report's launch.

the community and join the campaign for a global asbestos ban.' Sally Moore from Leigh Day solicitors, who will also be involved in the project, gave an update on recent compensation cases and the need to take up the issue of compensation for lung cancer as well as mesothelioma.

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(020 8227 2102 or email: unison@barking-dagenham.gov.uk) or Margaret Sharkey, London Hazards Centre (020 7794 5999 or email: mail@lhc.org.uk).

▲ Rising from the dust. Available free online from:

www.lhc.org.uk/members/pubs/asbsupport/rising.pdf

European Social Forum comes to London

Thousands of union reps, NGOs and campaigners on a vast range of issues are coming to London from all over Europe and beyond to meet and exchange ideas on agendas for change. The London Hazards Centre is participating with other organisations in preparations for the European Social Forum (ESF). Topics likely to be discussed include asbestos, corporate crime, worker and environmental protection and migrant workers.

The ESF in London is supported by the Mayor of London and the TUC and will be held at Alexandra Palace and other venues in north and central London on 14-17 October 2004. Previous Social Forums in Florence and Paris have attracted 5,000-plus participants.

▲ Official web site:

www.fse-esf.org



London Chinese Community Network organised a full day of health and safety training for London-wide Chinese groups as part of year three support work of LHC's BME Project which is now drawing to a close.

Bhopal disaster campaigners call for action

At a meeting in London in May 2004 campaigners from Bhopal called for support for the global day of action against corporate crime on the 20th anniversary of the disaster on 3 December 2004. They also called for financial support for the clinic set up by the victims in Bhopal to help those still affected and for support for a new trust fund they are planning to launch to help children born disabled as a result of the disaster and for 'ordinary people fighting extraordinary battles.'

Bhopal survivors, trade union activists and Bhopal slum residents, Rashida Bee and Champa Devi Shukla along with Satinath Sarangi of the Sambhavna Trust & Clinic in Bhopal, told the horrific story of the preventable disaster and their global campaign for justice. Over 20,000 men, women and children have died as a result of the chemical disaster at the US multinational Union Carbide's plant. Over half a million people's health has been affected.

The campaigners want company representatives to face culpable homicide charges in Bhopal's courts but they have been absconding for 12 years and the US government will not force them to attend. They are also campaigning for full compensation for the victims and for the US owners, Dow Chemicals, to clean up the massive environmental pollution problems.

Rashida and Champa both receive care at the Sambhavna Clinic along with many thousands more. The clinic needs constant financial support (see appeal details below). The two campaigners were

awarded the Goldman Award for environmental activists with a 'no strings attached' prize of \$125,000 – the largest and most highly regarded award in the world for grassroots environmentalists.

Champa and Rashida have decided to donate the entire sum of the award money to a trust that will provide medical assistance to Bhopal children born with deformities, run income generating projects for women survivors and institute an award for ordinary people fighting extraordinary battles against corporate crime in India.

Bhopal campaign websites

- ▲ www.bhopal.org for information about the clinic and financial appeal.
- ▲ www.bhopal.net for campaign information.

Cry Wolf

This is a very useful report illustrating how industry has exaggerated the financial cost of proposed legislation which would require stronger controls on chemicals at work and environmentally. Be it asbestos, cotton dust, vinyl chloride or chlorofluorocarbons (CFCs) industry has always loosed their seemingly bottomless bank accounts to fund massive PR campaigns to prevent new legislation protecting workers and the environment. This brief document published by the International Chemical Secretariat with the support of the World Wildlife Fund was clearly produced to



Training

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We run tailor made courses on a range of health and safety topics for unions, charities, community groups and councils. Contact us to discuss training for your organisation or workplace.

London Hazards Advice Line

Free advice and support for Londoners on health and safety at work and in the community. We aim especially to work with local groups such as tenants/residents organisations, black and minority ethnic networks, union branches, etc. We'll provide the level of support you need, from a single phone call to long-term support for a local campaign.

020 7794 5999

defend against American and European chemical companies continuing attacks on the EU's new chemical control proposals known as REACH (see Daily Hazard No. 79). While dealing exclusively with chemical issues the principles it discusses cross over to other health and safety fields, such as the massive industry campaign to undermine the Framework Directive and other EU Directives, notably those on VDU work and more recently vibration.

- ▲ www.panda.org/downloads/europe/crywolf0404b.pdf

Formaldehyde

Almost everyone, at home, work or in the community is exposed to formaldehyde. It is a colourless gas with a strong and pungent odour which is known to cause skin, eye and respiratory damage, and which, in sufficient doses, affects the heart and lung function and the menstrual cycle. It causes allergic reactions and mental disturbances and is a known cause of several types of cancer.

Hazards

Even very short term exposure to formaldehyde irritates the eyes causing pain, redness, blurred vision and severe eye watering.

It can irritate the nose and throat causing sneezing, soreness, coughing, shortness of breath, headaches and nausea. In severe cases of exposure to elevated levels it can lead to accumulation of fluid in the lung (pulmonary oedema).

Long term exposure causes chronically impaired lung function, skin hardening, swelling and flaking, dermatitis, allergic eczema, and cancer.

Formaldehyde is a skin and respiratory sensitiser. It is a sensitising agent which can stimulate the body's immune response so that a subsequent exposure to even a very small amount is likely to trigger an allergic response.

Despite this evidence, in 1986 the UK Industrial Injuries Advisory Council rejected designation of formaldehyde as a cause of occupational asthma prescribed for disablement benefit.

Formaldehyde has also been shown to cause sleep disturbance, impaired memory, reduced concentration, nausea and menstrual irregularity.

A known cause of cancer

The International Agency for Research on Cancer, (IARC) which is part of the World Health Organisation, has designated formaldehyde as a known cause of several types of throat and nasal cancer.

Exposure levels

In the UK formaldehyde has been assigned a Maximum Exposure Limit (MEL) of 2 parts per million (ppm).

Exposure to any substance for which a MEL has been set must be kept below that limit.

The MEL for formaldehyde is hard to explain in the light of HSE's own toxicology review which found that eye irritation can be caused by exposure to levels as low as 0.01ppm, 200 times less than the MEL.

Compare the UK exposure limit with the limit set in the USA where OSHA has set a permissible exposure level of 0.75ppm. In Sweden and Germany the maximum permissible indoor level is 0.1ppm. The UK control limits fail to take account of the fact that skin irritation can occur at levels well below the MEL and that many people will experience 'double exposure' by coming into contact with formaldehyde both at work and at home.

They also ignore the fact that home exposure affects the more vulnerable, such as the very young or elderly, pregnant women or people with existing skin or respiratory ailments.

It is planned that from December 2004 in the UK, Maximum Exposure Limits (MELs) and Occupational Exposure Standards (OESs) will be replaced by a system of Workplace Exposure Limits (WEL).

Exposure at Work

Formaldehyde is used in hundreds of industrial processes including the manufacture of paints, plastic products, paper, textiles, carpets, pesticides and fumigants, particle boards, MDF, chipboard and plywood, cosmetics, thermal insulation foams, furniture, biomedical products, leather goods, adhesives, glues and resins. Anyone involved in the manufacture or use of any of these products may be exposed to formaldehyde.

Less hazardous products are now available. 'Low gas' or 'zero gas' particle boards, chipboard and MDF products and low emission adhesives, glues and resins which emit much lower levels of formaldehyde have been developed. Safety representatives and workers in industries using these products should demand the safer materials.

Some local Construction Safety Campaign groups have succeeded in banning the use of fire retardant paints containing formaldehyde.

Exposure at Home

The main sources of exposure to formaldehyde in the home are furniture, which may contain formaldehyde in the glues, resins and board materials used in its manufacture, and urea formaldehyde foam products used in upholstery. Formaldehyde based resins are also used as a binding agent for mineral fibre based insulation products used for cavity wall and loft insulation and gap filling foams. HSE have published guidelines on work with urea formaldehyde. Formaldehyde vapour can be emitted for several years after installation. Additional exposure may come from formaldehyde-containing cosmetics and cleaning agents. Some carpets and soft furnishing textiles and wall coverings also contain formaldehyde based adhesives, finishes

and preservatives which can also raise domestic exposure levels.

Exposure from Environmental Pollution

Any process involving formaldehyde, for example in the manufacture of particle boards, can lead to the emission of fumes into the environment. There are several chipboard factories in the UK producing up to 1.5 million tons per year. These plants operate on a 24 hour basis 7 days a week. German law limits formaldehyde emissions to 0.03 milligrams per cubic meter of air vented to the atmosphere. Standards in the UK are much lower and tests have shown that emissions from the UK factory of one German based company are almost double the levels permitted by the German standard. Formaldehyde has also been discharged into rivers and water courses killing thousands of fish and polluting water supplies.

Action Points

Risk assessments and control measures for all processes and products where formaldehyde is used must meet the

minimum requirements of the Control Of Substances Hazardous to Health (COSHH) Regulations. Protection should follow the COSHH hierarchy of controls.

Formaldehyde is a relatively cheap material used in a wide range of processes and products but safer substitutes are available. Aim to introduce a safer alternative at work and do not purchase formaldehyde-containing consumer products for home use.

All work processes should be enclosed or provided with adequate extraction and ventilation. Waste materials should not be vented to the atmosphere. Where exposure above the maximum permissible level is likely, personal protective equipment (PPE) and respiratory protective equipment (RPE) must be provided to anyone working with or near formaldehyde. Respiratory protective equipment should only be used for brief periods and must not be used as a permanent substitute for adequate extraction or ventilation.

Regular air testing to determine concentrations of formaldehyde should be carried out every 15 minutes over a full working day/shift to determine

levels and ensure that maximum levels are not exceeded.

Negotiate for the adoption of exposure levels below the Swedish indoor standard of 0.1ppm.

Negotiate for the use of 'low gas' or 'zero gas' particle boards, chipboard and MDF, and for the use of low emission adhesives, glues and resins.

Medical examinations of people working with formaldehyde should be carried out at least annually and more frequently when an exposure to concentrations greater than 2ppm has occurred. Tests for lung function are essential.

Fully equipped safety showers with emergency eye baths must be made available. Training must be given in hygiene and in dealing with spills and other emergencies.

To reduce exposure where urea formaldehyde foam has been used:

- ▲ Increase ventilation.
- ▲ Remove excess foam but avoid skin contact.
- ▲ Seal gaps where foam has been applied using a suitable material such as sand and cement mortar.

Factsheets online www.lhc.org.uk London advice 020 7794 5999



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