



## **New Zealand Timber Preservation Council Inc**

### **Changes to Health and Safety legislation**

These submissions are made on behalf of the timber preservation industry.

The industry is a user of hazardous substances to treat timber for durability in service. The substances used are typically classified as;

- 3.1C flammable substances – preservatives carried in white spirit
- 6.1B toxic substances

Subsidiary classifications can apply as well, such as Class 9.

Our submission focuses on the following;

1. Inventory
2. Management of health and safety risk
3. Safety Data Sheets
4. Emergency management plans
5. Test certification
6. Approved handler

#### **Inventory**

Our inquiries indicate to us that most, if not all timber treatment sites keep and maintain an inventory of hazardous substances stored and used on their sites. Timber treaters are largely reliant on their chemical suppliers to assist them in some of the more technical details relating to the substances but the requirement for an inventory is not seen to be an issue.

#### **Management of health and safety risk**

Timber treaters recognise the need for risk management where timber preservatives are concerned. However, it should be noted that the greater proportion of the substances stored on site is in a diluted state (generally no greater than 6%) and so the level of risk should be kept in perspective, particularly with regard to water based preservatives. Again, timber treaters rely on the support of their chemical suppliers to manage this aspect of their activities.

#### **Safety Data Sheets**

Safety data sheets are supplied and kept up to date by chemical suppliers. Generally, changes to formulations are rare and so keeping the safety data sheets up to date is not an onerous requirement.

## **Emergency management plans**

Timber treaters are users of preservative chemicals to process timber to enhance its durability. While having some basic knowledge of the properties of the preservatives they use, timber treaters' knowledge of the substances they use is in most cases limited, especially in terms of emergency management plans and in managing risk. There are probably other industries in a similar situation where hazardous substances are used but where the user has limited knowledge of the properties of those substances. We therefore believe it would be helpful if an organisation such as WorkSafe NZ could develop a template or templates for emergency management plans which individual companies could adapt for their own situations.

Contact with local emergency services is a common practice already and is not seen to be difficult to comply with.

## **Test certification**

- Test certification is presently required in the timber treatment industry in the form of location test certificates for sites where class 3.1C substances are stored and used
- Approved handler test certification for sites where class 3.1C and 6.1B substances are stored and used
- Stationary containment systems, ie storage tanks for concentrates and diluted substances are certified by Test Certifiers under existing provisions
- The current proposal does not specify the changes to be considered and only identifies that this is an area where there are issues that should be improved. That being the case we submit that any proposals should be consulted upon amongst interested parties when they become clearer. In general it is our view that any test certification regime should be such as to impose minimal cost on producers and to be practical and achievable
- As previously mentioned, the bulk of the volume of timber preservatives stored on timber treatment sites is in diluted condition. While we understand that location test certificates may be justified for sites where class 3.1C substances are stored and used, sites where limited amounts of class 6.1B substances are stored and used (the bulk of these substances are stored and used in diluted form re-classified as class 6.1D notably CCA) should remain outside any consideration of an extension to the location test certificate regime.

## **Approved Handlers Test Certification**

- We understand that government does not believe the current system delivers the health and safety safeguards it should. It proposes therefore to discontinue the current scheme and replace it with a requirement that all workers handling and using hazardous substances be suitably trained.
- Our experience is that generally, many but not all personnel primarily involved in operating a timber treatment plant are certified as Approved Handlers. We understand the desirability of ensuring that all personnel are suitably trained. However the following issues should be considered before the detail of any changes are implemented;
  - a. The practicality of providing training to all staff
  - b. At times, the turnover level among treatment plant staff can be quite high

- c. What the level of training should be; the same as the present Approved Handler system?
  - d. The curriculum – how far should the training go?
  - e. How formal – NCEA?
  - f. How to account for deficiencies in literacy and numeracy when sometimes operators who have such deficiencies are in other ways excellent operators
- 
- The present Approved Handler Test Certification curriculum targets personnel in positions of responsibility and would be inappropriate and expensive if it were to be extended to all treatment plant personnel. Our suggestion is that Approved Handler Test Certification be retained for supervisors, managers and those in positions of responsibility and that a “lower” level of training focusing on aspects relating to the direct handling, storage and emergency procedures be introduced for operators. Approved Handler Test Certification would then be a qualification for those who are required to have supervisory or management responsibilities, have some knowledge of HSNO and are able to carry out tasks such as keeping and maintaining inventories and registries, tracking hazardous substances and disposal of hazardous waste. It may be that the Approved Handler Test Certificate curriculum is enhanced so that it is commensurate with and recognised as a level of due diligence that will be required under the revised health and safety legislation in 2015.

The Council appreciates the opportunity to present these submissions and would like to be kept informed about developments in this area. We are willing and able to provide further submissions when further details, especially regarding training and test certification are being considered.



Kevin Hing  
1 August 2014