



BOHS Response to HSE Consultation CD224 on LPG

The British Occupational Hygiene Society (BOHS) is a professional and learned society with the objects of improving scientific knowledge and practice in the prevention of ill health from occupational and environmental hazards. Its members are drawn from a wide range of multidisciplinary specialities and include leading academics and practitioners in the field. Our organisation includes the faculty of Occupational Hygiene, which provides examinations and qualifications in occupational hygiene. Our publication, the Annals of Occupational Hygiene is acknowledged as one of the leading global scientific journals in the field.

1 *What are your views on the introduction of some form of independent safety audit:*

(a) for LPG?

We can see the value of having a system of independent safety audits for high hazard/high risk work situations where the consequences of an incident can be very severe, particularly if the risk is from an easily identifiable source and affects an identifiable set of people. We believe that many LPG users may not have the skills or understanding to make a competent assessment of risk or to understand how risk may increase over time. Therefore we would support a fairly strict permissioning regime involving some kind of licensing for suppliers/installers along with periodic certification that the system is sound through an independent safety audit. However, we are not expert in safety engineering and do not feel competent to provide a definitive view on this.

(b) more generally?

If it is accepted that high hazard/high risk situations with potential severe consequences need careful independent supervision then it should be considered how far such systems should be extended. As a learned society, BOHS members are particularly concerned with managing health risks from hazardous substances and physical agents. We have considered whether the kind of approach we outlined above might be applicable to some areas of occupational hygiene practice, i.e. for occupational carcinogens, asthmagens and acute chemical hazards. It is our opinion that it would be inappropriate for a mandatory system of independent audits in these areas, either because they are already adequately dealt with under existing regulations, (e.g. asbestos removal and COMAH) or the costs of implementing a scheme would greatly outweigh any benefits in reduced ill-health burden.

Although we would not propose a statutory independent auditing scheme for most health hazard/risk situations we believe there is still a need to improve oversight of such situations, particularly within small and medium sized enterprises where the skills to properly manage the risks from highly hazardous agents are often absent. We believe that this leads to an unacceptable burden of disease from chronic occupational health conditions and that the main cause is lack of awareness and knowledge on the part of employers.

To address this we recommend that consideration should be given to a voluntary initiative promoted by HSE in relation to occupational carcinogens, asthmagens and other similar situations involving exposure to highly hazardous agents. HSE already acknowledge that many small companies do not have the skills to deal with assessment of some chemicals. The COSHH Essentials scheme, for example, directs employers to consult with an occupational hygienist or other appropriate expert if using substances rated as highly hazardous.

The aim of a voluntary scheme should be to increase the take-up of specialist advice by employers who have a number of employees exposed to occupational carcinogens, asthmagens or similar. The approach could involve regular audits by the specialist and the issue of a report that would be available to the employer, employees and the HSE. Companies would be able to gain some sort of “badge” recognizing participation and performance in the scheme similar to the Investors in People (IIP) system. In addition, this type of scheme could offer HSE advantages in allowing it to prioritize inspection initiatives based on the information collected.

BOHS would be happy to discuss these ideas further with HSE or any other interested parties.

2 *What do you think are the practical implications of introducing an independent safety audit:*

(a) for LPG?

We have no further comment on LPG.

(b) more generally?

Introduction of a safety auditing scheme would introduce some difficulties in ensuring that the auditors were truly independent and that they were competent to inspect the risks present in each workplace. We believe that unless these practical issues were adequately addressed a safety auditing scheme would be impracticable and lack credibility. These issues further convince us that it is inappropriate to instigate a statutory safety auditing scheme more generally.

BOHS has no further comments to make on the consultation document.