



Saving Welsh Lives

**Actions for the Welsh Government to
Prevent Workplace Illness.**

A Report by the British Occupational Hygiene Society, the
Chartered Society for Worker Health Protection

Overview

There is a crisis in workplace ill-health in the UK and Wales is faring worse than other nations.

The Welsh government has the legal power and duty to influence workplace health outcomes. It has shown its capability during the pandemic to have impact in protecting workplace health.

This Report highlights areas of Government action which can and must act to save Welsh lives. In doing so it can secure a more sustainable future and healthier and fairer Wales.



Why Can't This Report Be Ignored?

The crisis in workplace health protection in Wales is undermining its social and economic progress and yet it is arguably easily preventable using the powers devolved to the Senedd.

76,000 Welsh women and men suffer from preventable illness caused by their work. The direct cost to Wales of this burden of illness is over **£500m per year.** Aside from the cost in human terms – of wasted lives and skills – there are additional indirect costs in health and social care, fiscal impacts and on costs to business effectiveness amounting to **1.6 million days of work lost.**

The Report focuses on actions that can make a difference and save lives in three key areas: Asbestos exposure, and reducing the burden of ill-health in the Construction and Agricultural sectors.

The impact is worse in Wales than in other nations in the UK. Economic inactivity is growing in Wales. Long term ill-health is responsible for nearly 40% of economically inactive men and 30% of economically inactive women, but at least half of this illness is as a result of preventable workplace illness.

Worse still, the burden falls more heavily on women than men. Based on ONS statistics 7% of the potential male Welsh workforce are economically inactive because of occupational illnesses and a staggering 13% of potential women workers.

It is not just within the legal competence of the Government of Wales to address this crisis, it is written into its constitutional role. The Report points to examples of affordable actions to achieve many of the crucial outcomes outlined in the Well-being of Future Generations (Wales) Act 2015 and Social Services and Well-being (Wales) Act 2014. In fact, these Acts mean that the **Government of Wales must actively consider the issues, responses and solutions outlined in this report.**

Wales cannot rely on regulatory intervention by the Health and Safety Executive and leave workplace health protection to reserved powers of the Westminster Government. The Government of Wales has the power and potential to address these issues. This Report outlines areas of action within the exclusive responsibility of the Welsh Government. It sets specific goals which can be directly achieved by Wales. If the Welsh government does not act in these areas, there is nobody else to blame.

Protecting people from preventable workplace illness is inherent in the Government of Wales' ambitious targets to meet international standards and UN Sustainable Development Goals. The right to a Healthy Working Environment was recently adopted by the International Labour Organisation and a new measure of occupational illness is in place through the World Health Organisation. These global developments require at least a systematic reconsideration of what the Welsh government is doing in this area.

Without effective workplace health protection, Welsh men and women will die in the pursuit of climate change objectives.

Improving our building stock is likely to cause the biggest potential programme for the disturbance of asbestos for decades. Asbestos exposure is still the major cause of occupational cancer, and asbestos-related cancer is seeing a slower decline in Wales than the rest of the UK. Energy conservation challenges will also directly impact workplace ventilation (essential for the control of health hazards) and also legionella control. New industries, such as battery recycling and insulation manufacture providing environmental solutions are growing in Wales, but this must not be at the cost of the health of workers.

The biggest enabler of worker health protection in Wales is education. Workers cannot choose to avoid the risks of irreversible workplace cancers, for example, if we do not know about them. The embedding of workplace health protection messages in the Welsh, English and other languages is crucial. The public health and education message needs to be meaningful in Wales.

This Report has been prepared by one of the world's oldest and most respected independent scientific charities on workplace health protection. BOHS encompasses the professional bodies for Occupational Hygiene (the science of the protection from all forms of workplace exposure, including chemical, biological, radiological and physical exposures) and the professional body for Asbestos science. It is expert evidence that cannot be ignored.



Why a Workplace Health Protection Policy Underpins the Future of Health in Wales

Wales, like the rest of the UK, faces an unsustainable burden on health and social care, growing challenges in the labour market, increasing social inactivity and the challenge of addressing social inequality. It is only by reducing illnesses that create high demand on health and social care, shorten working lives and that most affect those least able to manage them that we can have a sustainable solution to this.


The workplace is invariably a human-created environment. The things we expose people to at work are a matter of human choice. This means the illnesses caused by the workplace are the ones we can most easily prevent. By stopping someone getting exposed to the causes of disease in the workplace, we can save on occupational health costs, extend working lives, increase contributions through taxation, reduce benefit costs, save on health costs, save on paid social care and reduce the need for informal social care.

Even if we ignore the benefit of avoiding pointless deaths, enduring pain, mental torment, blighted families and burdened communities, the economic case is overwhelming. As only one example, in the UK, if we halved the number of cases of workplace respiratory cancers, we could double the expenditure on all paediatric cancers. In Wales, based on an analysis of ONS and HSE statistics, **7% of men who are economically inactive and a staggering 13% of women, have become so as a result of the work that they do.** Our collective failure in workplace health protection is institutionally discriminatory against women.

The staggering 500 occupational cancer deaths each year in Wales (estimated by HSE) are more than the total number of deaths through drug misuse in Wales. Occupational illnesses are themselves triggers for other public health issues, with clear links between occupational illness-induced inactivity and obesity and substance abuse. There is a direct correlation between occupational noise-induced health and dementia. The pain caused by musculoskeletal disorders impacts sleep and mental health, an area of crisis in both occupational and general public health.

While the emphasis is often on how workplaces can reinforce general public health messages, reducing health exposures in the workplace can have a more direct and long-lasting impact on general health. Most adults spend most of their lives working. It is there that the die can be cast for their long-term health or sickness. A focus on stopping people becoming ill as a result of workplace exposures should be at the heart of health policies for Wales. At the moment this is missing from policy documents, fuelling demand for scarce resources and creating a legacy of ill-health for the future.

This Report focuses on how and why the Welsh Government can act to save lives.



Why the Welsh Government Can, Should and Must Act to Protect the Health of Welsh Workers

It is a misconception that workplace health protection is a matter of Health and Safety regulation, and therefore reserved to Westminster and the HSE. This reservation applies to the enforcement of Health and Safety law and regulations. However, as Welsh local and national government has demonstrated over recent years, much more can be achieved than through regulatory enforcement alone. The current approach has failed to stem the burden of occupational disease blighting Welsh lives. A progressive, sustainable and joined-up approach is needed by the public sector in Wales to address this growing crisis.

As the Westminster Government seeks to roll back regulation of health within the workplace and funding for the HSE ceases to match the demands on its resources, the effectiveness of Health and Safety law in Great Britain is likely to diminish. If the impact of deregulation and lessened regulatory enforcement is not mitigated by other strategies, workplace health will suffer. This Report is a systematic analysis of where the targeted use of devolved powers can positively impact health.

The Welsh government is committed through legislation to deliver positive health outcomes and to aspire to meet international standards through the pursuit of sustainable development goals. **At present, for every 20 people in work in Wales, there is one person who is ill as a result of work.** The ratio of those working, to those who need support through taxation is getting smaller. It is reasonable to infer from ONS statistics that over half of those who are economically inactive through ill-health have become so because of exposures at work. This trajectory is not sustainable.

Current Westminster government policy aims to return sick people to work, but is not underpinned with a strategy to prevent workers from getting occupational illnesses in the first place. This will inevitably result in people getting more broken by work, but also the diversion of resources from preventing ill-health to monitoring treatment. This can only result in poorer long-term health outcomes. Such an approach is not the way to create sustainable decent work or good health and wellbeing within the meaning of the Sustainable Development Goals.

The International Labour Organisation recognises the right to a healthy work environment. The statutory commitment of the Welsh Government to human rights and the United Nations Sustainable Development Goals require it to now consider how it can meet this standard. This Report aims to provide practical and affordable means by which Wales can protect this right.

We know through the experience of the pandemic how a devolved Welsh Government can use its powers to deliver innovative and effective ways of securing better health for the people of Wales. By thinking beyond the boundaries of how things have always been done in the past, Wales can deliver solutions to save lives. This Report asks the First Minister and the Welsh Government to accept the challenge of turning the tide of preventable ill-health caused by work and provides specific, affordable and achievable examples of how the Welsh government can transform health through work.



Keeping Wales Safe from Asbestos

Asbestos exposure results in more occupational cancer deaths than any other cause. **According to the HSE, the rate of decline in deaths in Wales is slower than in the rest of the UK.** Over 5,000 public buildings in Wales, including many schools and hospitals, contain asbestos. This is likely to be a fraction of all Welsh buildings containing this toxic substance.

All Welsh Councils should be able to direct people and businesses in the locality to safe and legal means of disposal and removal of asbestos. However, this is not the case. **At the time of writing for example, according to Cardiff Council's website, there were no licensed asbestos removal contractors operating in the Cardiff area,** yet it arguably has the country's large concentration of buildings which contain asbestos. Local Government and the Welsh Government need to work together to ensure that there is comprehensive, accessible, accurate, and up to date information enabling the safe removal of asbestos and to work to ensure that there is asbestos expertise available to deliver at the point of need.

It would be desirable to ensure that there are facilities available in all of Wales to safely dispose of asbestos. At present, the disposal of non-licensable asbestos in Wales is a postcode lottery, with some Councils providing a pick-up service and others not even providing a local place of safe disposal. In the absence of this, it becomes more likely that asbestos will be mis-handled and cause fly-tipping of asbestos and the risk of sickness and death.

Of the buildings which require upgrading to meet our climate change targets, the European Commission estimates 85% contain asbestos. This means that a generation of workers involved in the upgrading of Welsh homes and business premises are likely to be disturbing a legacy of asbestos. The Welsh government are in a crucial position to lead the UK by using its powers to ensure that they are safe from exposure to asbestos. This is through a three-pronged approach: Information, Education and Building Regulation.

The majority of building owners, including commercial and private landlords are probably unaware of hidden asbestos. By law, unless a building owner knows that they do not have asbestos, then significant changes to a building should have a refurbishment survey. Building owners should be made aware that the installation of heat pumps, solar power and replacement of old heating systems could give rise to the disturbance of asbestos. These are activities which are unlikely to be subject to any regulatory scrutiny and can pose a significant risk to building occupants and installers. The Welsh government needs to act to raise awareness of the problem of dangerous asbestos.

Coupled with this, there needs to be concerted education, especially for the green energy workforce to ensure that they are aware of the hazard and can recognise and manage risks. In the context of its influence over education, the Welsh government is uniquely placed to ensure that those in the construction, electrical and heating industry are made effectively and specifically aware of asbestos risks in training and apprenticeships. By educating Welsh workers, they have more opportunity to avoid life-threatening exposures.

Asbestos is a toxic substance most likely to be disturbed during demolition or refurbishment. While there is a legal duty to undertake a survey when this happens, there is no mechanism to ensure that this happens routinely. Although it is the most widespread threat to human health in building, there is no mention of asbestos in the building regulations. Wales has the power to require that building consent applications identify the location of asbestos for demolition or renovation or are encountered with evidence of the absence of asbestos. This will protect building owners, construction professionals and building inspectors, as well as the environment. In this way, Wales could lead the UK in a pragmatic way of ensuring existing duties turn into practical action.

Wales should not bequeath future generations the burden and cost of asbestos and the duty of the Welsh government to act to avoid it is implicit in the Well-being of Future Generations (Wales) Act 2015. Ideally, a Welsh national asbestos plan could deliver a future free of incurable cancer and the burden of hundreds of deaths each year.



Saving Lives in Construction

10% of Wales GDP comes from construction, employing 130,000 workers, accounting for over 8% of the workforce. Engineered stone, quarrying and stone-masonry are sectors of expertise in Wales. However, these industries are prone to exposure to respirable crystalline silica (RCS). This is a fine dust produced by working with rock, engineered stone (such as kitchen worktops) and construction materials such as bricks, blocks and mortar.

Based on UK statistics, 250 Welsh construction workers will be diagnosed with cancer because of preventable workplace exposures (175 because of asbestos, but 45 because of RCS) and 185 construction workers will die in Wales, as a result of preventable workplace exposures. This is more than all of the UK's fatal building accidents in 2022.

Inhaled silica has blighted the lives of Welsh miners and quarry workers for centuries, causing irreversible and untreatable cancers, as well as being a major cause of chronic obstructive pulmonary disorder. It is estimated that Wales has close to 7,000 occupational COPD cases, costing £65m per year. While Wales leads the UK in COPD clinical practice, this is not itself reducing the instances of COPD, but simply providing a professional reaction to it. RCS exposure, as a cause of cancer and COPD, is entirely preventable and the Welsh government has the tools to significantly influence this.

RCS exposure can be prevented very cheaply and easily – for example by using water to suppress dust, vacuum cleaners instead of brooms for clean-up and using dust capture equipment, rather than relying on masks. However, these preventative measures rely on construction workers being aware of the significant risk to themselves and behaving accordingly.

The Welsh Government has at its disposal powerful tools to educate and influence the behaviour of the construction workforce for better health. The Welsh Apprenticeship Framework in Construction will directly influence a whole generation of workers. Explicit inclusion of risk recognition for silica and asbestos, as well as good control practice would match the approach taken by Skills for Wales in their Construction and Building Services Engineering qualifications. Moving further, given the risk to workers and the social cost, explicitly assessing the ability of workers to recognise and use good controls would have a significant impact on understanding, attitude and behaviour.

The Welsh Government can also take innovative steps to impact climate change, waste, energy and the generation of RCS on building sites. Much of small building work in Wales involves the construction of house extensions. The current planning rules use rounded measures of distance to limit permitted development extensions, such as 1m step back, 3m extensions and 6m extensions. There is an understandable tendency by homeowners and architects to build to the maximum allowable distances.

However, using typical masonry units, such as common bricks, following good building practice it is impossible to achieve these lengths without cutting at least one brick per course, for each side of an extension. A common extension will involve 100 courses of bricks, resulting in the cutting of 200-300 bricks per project and up to ½ ton of waste, a huge amount of wasted energy in unused brick material, in machine cutting, but also increasing the risk of cancer or COPD for workers.

By amending Welsh planning to use lengths that accord with layout dimensions for good practice in brickwork (e.g. by moving from 3m to 3,185cm in planning guidance), **the Welsh government could save lives, money, and the environment, with a stroke of a pen.**



Safeguarding the Health of Agricultural Workers

Wales is commendable for supporting its farming industry through Farm worker health and safety approach and its commitment to health and safety education in the Sustainable Farming Scheme.

However, the former does not provide any focus on physical health. It is absolutely right to take mental health in agriculture seriously, with **mental ill-health afflicting 31% of respondents**, according to the largest ever research study on ill-health in agriculture in England and Wales (2022). However, more than half of the 15,000 respondents reported problems with pain, indicating that musculo-skeletal disorders, hand-arm vibration and other causes of physical discomfort are at epidemic proportions in farming. Chronic pain has a strong association with stress and mental health issues. It also is often an indicator of potential long-term health disorders which can shorten working lives and create dependencies in later years.

The Sustainable Farming Scheme should have a focus on developing work practices which improve the ergonomics of farm work, help farmers identify causes of potential musculo-skeletal disorders and provide a focus on pain as a cause of stress and mental health issues amongst farm workers. Of course, there are many other significant causes of ill-health in farming, especially in relation to exposure to dust (causing high incidences of respiratory illness) and biological hazards, not to mention asbestos. Through education, information and health support, the Welsh government can help sustain and grow Welsh farming.



What Is BOHS and How Can It Help?



BOHS

The British Occupational Hygiene Society and its two Faculties (the Faculty of Occupational Hygiene and the Faculty of Asbestos Assessment and Management) is a scientific charity, which is volunteer-led and funded through its own work as an awarding body, publisher and through membership subscription.

For 70 years, it has brought together scientists, academics, experts from the HSE, professionals and clinicians to provide free technical guidance, training materials, free seminars/webinars and support to prevent disease in the workplace. Prior to the HSE, BOHS set occupational exposure limits for substances such as asbestos. Its Breathe Freely free resources for construction health are now delivered in all major English-speaking countries of the world.

BOHS is committed to a vision where the workplace is not a significant cause of ill-health. It stands ready to support with the provision, development and delivery of materials and expertise to support Wales in its battle against workplace ill-health. Working in partnership with the institutions and people of Wales, we want to make a difference and believe that through greater understanding and awareness, we can help save Welsh lives.