Strategic approach to reducing exposures to carcinogenic substances in the Irish construction sector

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IRELAND JOINS ROADMAP ON CARCINOGENS

Ireland is now an official partner of the Roadmap on Carcinogens. Mr Pat Breen, the Irish Minister for Trade, Employment, Business, EU Digital Single Market and Data Protection signed a written commitment in support. Ireland will become increasingly engaged with other Members states on the important topic of carcinogens.
H.S.A Strategy Statement 2019-2021

Our Mission

We regulate and promote work-related safety, health and welfare, market surveillance and safe use of chemicals and products and provide the national accreditation service.

How we Work

Improve the way we work through people, processes & technology

Support, educate and raise awareness to prevent accidents, injuries and ill health

Grow the national accreditation service to enable and support enterprises and public services

Partner and collaborate in support of healthy, safe and productive lives and enterprises

Increase focus on compliance through risk based inspection and enforcement

Regulate

Promote

Influence

Accredit
Construction Sector Strategy 2019-2021

Implementation & Steering Group

Sub group
- Working at Height

Sub-group
- Duty Holders

Sub-group
- Traffic Management

Sub-group
- Occupational Health & Hygiene

Key Focus
Respiratory health - carcinogens e.g. respirable crystalline silica, asbestos
Musculoskeletal disorders

Key Strategic Areas (KSA) for each Sub-group to address

1. Inspections
2. Legislation & Policy
3. Stakeholder & Communication
4. Advice, Tools and Guidance
KSA 1 - Inspection Approach

- **Routine Inspections**
- **Campaigns** - Two week campaigns in October / European Safety Week – Over 400 inspections & baseline questionnaires completed.
- **Accompanied inspections** – with Occupational Hygiene & Occupational Health inspectors.
- **Specialist inspections** - substances of concern e.g. Spray foam, chemicals in construction products, engineered stone.
Inspection Campaign 2019

- 480 Inspections completed
- 6% Formal Enforcement
- 58% of sites issued with reports of inspection
- 80% of sites had appropriate controls

Initial Positive Findings
- Dust risk assessments completed
- Water suppression methods in use or available
- On tool extraction in use or available
- FFP3 and FFP2 CE marked respirators & fit testing
- Block splitters
- HEPA vacuums for housekeeping
- Dedicated work stations
- Tool box talks
- Good general awareness amongst workers on associated health risks

- Limited or no designing out of hazard, health surveillance & personal air monitoring observed.
Inspection Campaigns

Behavioural change requires repeat interventions & positive reinforcement
• **Operational Guidance for Inspectors** – Detailed Operational Minute (based on SLIC CHEMEX guidance for National Labour Inspectors) with initial enforcement expectations.

• **Amendments to Carcinogens and Mutagens Directive 2004/37/EC (CMD)**

• **Update to 2018 Code of Practice for Occupational Exposure Limit Values**
### Operational Guidance (example)

#### 3.1 Respiratory Health Hazards – Inspector advice and Initial Enforcement Expectation

<table>
<thead>
<tr>
<th>Task</th>
<th>Eliminate or limit the RCS dust by:</th>
<th>Control the RCS dust by using:</th>
<th>Possible Actions for Poor Practice</th>
</tr>
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</table>
| 1. Cutting concrete kerbs, blocks and paving with a cut-off saw | - Limiting the number of cuts during design/layout  
- Using lower energy equipment like block splitters  
- Getting material cut off site and delivered | - Water suppression and  
- RPE* with an APF of 20 e.g. FFP3 | - Consider stopping the work when all controls missing/ineffective - Issue Prohibition Notice (SHWWA 2005 to provide safe place of work – Section 8(2)(c))  
- Consider providing advice in situations where one control is missing/ineffective - Issue Improvement Notice (Gen Apps 2007 Reg 28(m) & (q) – Use of work eqpt) |
| 2. Chasing concrete and raking mortar | - Limiting the need for chasing at the design/layout stage  
- Using a work method that limits/does not need chasing, like over-covering cables | - On-tool extraction using an H or M Class extraction unit and  
- RPE* with an APF of 20 – e.g. FFP3 consider powered RPE for longer duration work | - Consider stopping the work when all controls are missing/ineffective Issue Prohibition Notice (SHWWA 2005 to provide safe place of work – Section 8(2)(c))  
- Consider providing advice in situations where one control is missing/ineffective Issue Improvement Notice (Gen Apps 2007 Reg 28(m) & (q) – Use of work eqpt) |

*RPE: Respiratory Protective Equipment
KSA 3 – Stakeholders & Communication

• Construction Safety Partnership Advisory Committee (CSPAC)

• Construction Safety Week

• Construction Workers Health Trust

• Irish Cancer Society – Lung Cancer Awareness Week

• Conferences, Workshops & Contractor Briefings
Construction Dust

Breathing in some construction dusts over a long period of time may result in lung diseases such as asthma, silicosis or lung cancer.

- **Exposure to hazardous construction dusts is avoided by using safer alternatives** (Avoid stone with a high silica content, hardwood dusts, MDF etc.)

- **Building materials are ordered in the correct size to reduce on-site cutting**

- **Dust levels are kept as low as possible**
  - Tools and equipment which generate dust e.g. concrete / road saws / chasing equipment, are fitted with water suppression or dust extraction systems with HEPA filters. Wet down dusty work areas e.g. avoid dry sweeping, damping down during demolition work.

- **Adequate ventilation is provided and maintained**
  - Local extraction, doors / windows, ventilation fans, the use of temporary screens or sheeting to minimise exposure to other persons e.g. during road works.

- **Vehicles working in dusty environments (e.g. handling construction debris, demolition etc.) are fitted with enclosed ventilated cabs and filtered air intakes where possible**
  - Doors and windows of vehicles should remain closed at all times.

- **Employees are informed of the health risks (e.g. silicosis, asthma) associated with hazardous construction dust(s)**
  - Inform employees to report symptoms if they develop. Health surveillance to detect early symptoms should be provided where needed

- **RPE (Respiratory Protective Equipment, i.e. FFP3 Respirator Mask / P3 Filter Half Mask) is provided and worn when dust levels cannot be lowered and employees are trained in its fitting and use**
  - RPE must be suitable for the dust and must fit properly (face fit) and worn correctly every time. Refer to ‘A Guide on Respiratory Protective Equipment’ in Learn More.

- **Hands are washed before eating, drinking and smoking**
KSA 4 – Advice, Tools & Guidance

• E-learning – Free online courses at http://hsalearning.ie/

Asbestos Awareness E-course for Tradespeople

Chemicals E-courses Modules 1 & 2

Video
Monitoring Strategic Outcomes

• A range of Key Performance Indicators (KPIs) will be utilised to assess impact of interventions and monitor implementation of the 2019-2021 Construction Strategy

**Inspections**
Number of inspections completed, level/type of enforcement issued, Question sets completed and data trends over the three years etc.

**Policy & legislation**
Number of relevant legislations and codes of practice developed etc.

**Stakeholder and Communication**
Number of meetings, briefings, seminars and conferences, website & social media hits, trend data from other stakeholders e.g. CSPAC, National Cancer Registry, Irish Workers Health Trust etc.

**Advice, Tools & Guidance**
Number of E-learning courses developed/completed, guidance downloads, information leaflets disseminated on sites etc.
Next Steps - 2020 & 2021

Inspections
- Routine inspections/ 2 week Campaigns in Q4
- Specialist inspections - welding fume, wood dust etc
- Market Surveillance - Chemicals in construction products

Policy & legislation
- Publish CMD amendments and Code of Practice for OELs
- Continued EU collaboration e.g. via SLIC CHEMEX
- Data collection

Stakeholder & communication
- Continue working with Construction Safety Partnership
- Designer workshops

Advice, Tools and Guidance
- Develop construction health webpages/ portal.
- BeSmart updates
Thank you