

HEALTH AND SAFETY AT WORK STRATEGY

Feedback Form | April 2018

What we're consulting on

We are seeking **your feedback** on a draft Health and Safety at Work Strategy (**the draft Strategy**), beginning in 2018 and setting the aspirations for the New Zealand health and safety system over the next ten years. Your feedback will help to refine and improve the Strategy before the Government makes any final decisions.

You can find the **consultation document** with information about the draft Strategy at:

<http://www.mbie.govt.nz/info-services/employment-skills/health-and-safety-at-work-strategy>

What we're asking

To help focus your feedback, we have **10 questions**. You are welcome to respond to some or all of the questions. Where possible, please include **evidence** to support your views, for example references to independent research, facts and figures, or relevant **examples**.

How to give your feedback

- **Submissions are open until 5 pm on 8 June 2018**
- Send this completed form as a **Microsoft Word** document or **PDF** to: HSWStrategy@mbie.govt.nz
- **Include** your name, or the name of your organisation, and contact details

Alternatively you can post your submission to:

Health and Safety at Work Strategy
c/o MBIE – Health and Safety Policy
PO Box 1473
Wellington 6140
New Zealand

Send any questions you have in relation to the submissions process to: HSWStrategy@mbie.govt.nz.

Further information

The **consultation document** contains information about how your submission will be used, including private information you supply (page 17).

Further detail about the draft Strategy, including a **supporting document** with further information, is at: <http://www.mbie.govt.nz/info-services/employment-skills/health-and-safety-at-work-strategy>



IRHACE and CCCANZ on behalf of the HVAC&R Industry wish to answer these questions on 2 fronts as below:

Q1 Does the Strategy set a clear and ambitious direction? Why or why not?

- 1. Overall Health and Safety-** Whilst we appreciate the opportunity to consult on the Strategy and the need for reform. We believe the strategy should include the other 16 hours of an individual’s day. What happens outside work in their personal life can significantly influence Health and Safety issues that can manifest themselves in the workplace.

You mention psychosocial risks, certainly they and personal / mental issues such as stress, fatigue and violence in the home can contribute to harm, accidents and incidents in the workplace.

Conversely the above issues occurring in the workplace can manifest in issues at home.

For instance, an employee may be going through marriage issues, not speak of with work colleagues, but it could affect their ability to perform or concentrate at work. An accident (be it major or minor) may occur. The employer investigates and may still not be made aware that the issue in the persons personal life has indirectly influenced the outcome of the work related accident.

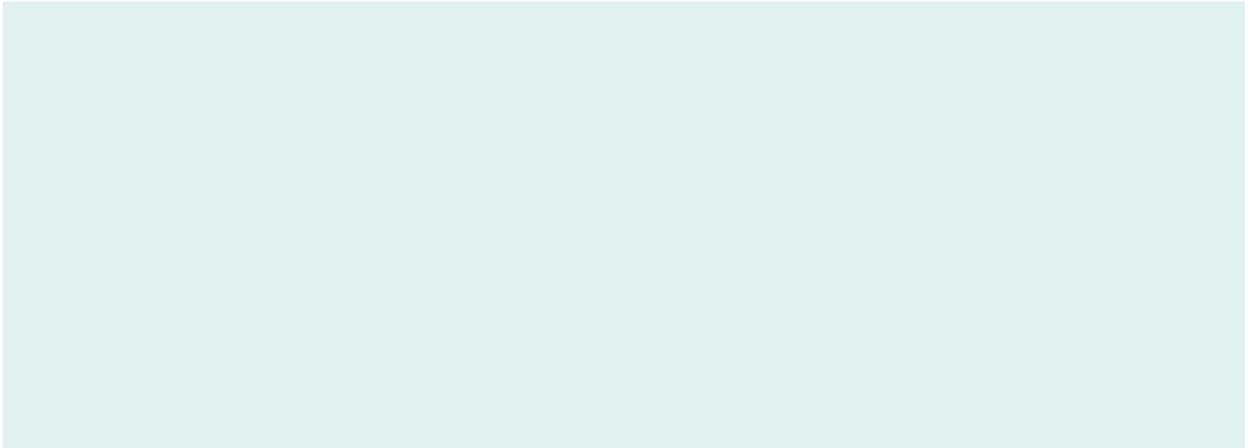
Q2 Does the Strategy provide a platform for better coordination and alignment? Why or why not?

We make no comment

Q3 Does the Strategy focus on the areas and people that will make the biggest difference? Why or why not?

- 1. Overall Health and Safety** – again as in 1, without considering the entire lifestyle situation, the workplace is only a part of the issue.

There continues to be a need to address factors in the employees’ personal life which might influence a work related issue



Q4 Does the Strategy provide clarity about roles and responsibilities?

Why or why not?

1. **Overall Health and Safety** – We don't believe this strategy provides sufficient emphasis on the employee taking responsibility for their own health and wellbeing, overall. Just as they also ought to take more personal responsibility for workplace safety.

We also believe that there should be better legal safeguards for employees speaking up to their employers regarding perceived hazards. In some industries and cultures employees defer to employers and don't mention safety issues as they come to hand

Training employees in their rights and entitlements is a key opportunity for a revised strategy

Q5 Does the Strategy take into account the best information we have?

Why or why not?

We make no further comment

Q6 Does the vision describe what you think our health and safety system should achieve?

Why or why not?



See Page 9 consultation document

- 1. Overall Health and Safety** – Here you speak about the holistic approach, their lives and communities. There is insufficient reference to this in other sections of the consultation document.

That said, this vision does not go deeply enough into the 16 hours a day we aren't at work, that can just as easily influence our workplace health and safety

Q7 Are these the most useful goals?

Why or why not?

Pages 10-13 consultation document

- 1. Overall Health and Safety-** yes generally these are useful goals

- 2. Industry View –**

Impact Priority 1: as the Heating, Ventilation, Air-Conditioning & Refrigeration (HVAC&R) Industry we are constantly cognisant of the risks associated with workplaces, the equipment and the refrigerants we work with.

A 10-year goal is useless to our industry, as with the impending HFC Phasedown in 2019, and the introduction of other and often more volatile Low Global Warming Potential refrigerants, we are conscious that we are seeing the risks now, and these will escalate as new refrigerants are introduced and the above milestone of the Phasedown draws nearer.

Generally, our industry employs sound Health and Safety Practices however without regulation or mandatory training and a resultant credential to handle the refrigerants and equipment there are significant perceived risks

Capability Priority 3: The HVAC&R industry as mentioned have voluntarily taken steps in recent years to lift the capability and standards of employees, through targeted training, providing input into the content of industry apprenticeships and advocacy for members and the industry, as a whole.

Our industry like many in the construction sector is filled with a number of SME's who require guidance and support. The need to wrap services around these often inexperienced and under resourced businesses is paramount

(Refer below, Q8 for more detail)

Q8 What would make the biggest difference in each priority area?

Pages 10-13 consultation document



2. Industry View-

Impact Priority 1 and Capability Priority 3: The HVAC&R industry, IRHACE, CCCANZ and RLNZ (our training entity) work to voluntarily provide high standards of training and compliance however as those standards are not currently mandatory, as a result the industry and employees remain exposed and at risk of injury

As mentioned above this will continue as we introduce more volatile or flammable refrigerants into the market as (current HFC refrigerants are phased out)

As an industry we are working with MBIE, EPA and Worksafe to develop and introduce a mandatory credential that will ensure high-standards for both employers and employees in the industry.

It is a sad state of affairs, when an industry and employers almost have to beg to have a credential and a standard of compliance introduced and mandated to ensure an industry is safe.

That said our industry will continue to forge ahead to affect that change to ensure a fair and safe environment for staff and to raise the standards in an industry we are proud of

Q9 Are these the measures we need to know if the system is working better?

What else do we need to know?

Page 14 consultation document

We make no further comment

Q10 Who needs to be involved in turning the Strategy into action?

What can you do?

Page 15 consultation document

- 1. Overall Health and Safety** – until every employee is able and charged to take responsibility for their and other’s actions, the change the strategy alludes to won’t be possible.

We welcome your strategy and would appreciate the opportunity to continue to be part of this change.

- 2. Industry View-** the HVAC&R industry continue to advocate for the opportunity to influence and drive change for the industry. A mandatory credential that will support safety for



employees and the public is our goal

Any other comments?

We welcome the opportunity to participate in this submission and would welcome the opportunity to participate in further discussions around these important topics.

- 1. Overall Health and Safety-** As mentioned above, there are 24 hours in a day, 16 of which are spent outside the workplace (on average). What occurs in those hours is a fundamental influence on the outcome on the workplace

We support your view that psychosocial issues are a key part of health and safety in the workplace and welcome any further inroads you make on those issues for all employers and employees.

- 2. Industry View** – You will note in Questions 7 and 8 in particular that our industry are frustrated by the lack of progress on developing a mandatory credential. Whilst we see sound progress with MBIE, Worksafe and EPA in this area currently we would welcome further discussion to ensure standards are lifted and the goals you mention are achieved sooner rather than later