



Responsible Care[®]
OUR COMMITMENT TO SUSTAINABILITY

Association of Building Compliance Independent Qualified Practitioners

Responsible Care NZ

The NZ Chemical Industry Association

September 2022

Presented by Ken Clarke



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- ▶ **Purpose of Today**
 - ▶ Compliance Certifiers role
 - ▶ The PCBU viewpoint
 - ▶ The Certifiers viewpoint
 - ▶ Gaps
 - ▶ Crossovers
 - ▶ Assumptions

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Compliance Certifier role

- The Most Hazardous Substances
- An Independent Check
- Compliance Certificate issued
 - *May be several at a single location. or.....*
 - *Refusal to Certify*
 - *Inform the PCBU*
 - *Notify Worksafe NZ of the non-compliance*

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PCBU Viewpoint

- Compliance Complexity 101
- A necessary ‘must- have’ in order to operate legally
- An independent check – used for self-analysis
- A direct cost to the business to be passed on
- Inconsistent pricing and service delivery quality
- Reduce inventory to avoid
- Potential for cosy relations with Certifier

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Compliance Certifier Viewpoint

- Must Certify only – No consultation / Advice
- Validates systems and processes in place to maintain a safe and healthy exposure operation
- Don't go into technical detail of a particular system
- Seeks evidence being in place
- Required only to certify against HS Regulations and SWIs as written

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Locations with Hazardous Substances

- HSL – Hazardous Substance Location
- Transit Depot
- ‘Other’ – Any place that may have chemicals on location but are below trigger thresholds
- MHF – Major Hazard Facility.... A large HSL

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Hazardous Substance Building type

- Workroom – In-use
 - Types 1, 2, or 3
- Store - In Storage (container lid always closed)
 - Types A, B, C, or D

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Gap Analysis – Certifier vs IQP

- Sprinkler systems - Do Certifiers check if fit for purpose???
- Sprinkler design - ELH – OH or EHH
- Gas flooding and deluge systems – Size? Foam type? Changes?
- Fire Alarms – Types 1 to 7 NZS 4512..Certifier involved at all?
- Atmosphere monitoring systems – Gas Detectors
- Lighting (Emergency and Normal) Intrinsic ?

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Gap Analysis – Certifier vs IQP

- On site hydrant systems
- Smoke control
- Standby electricity supply to critical chemical management
- Temperature controlled chemical storage and processing
- Emergency Response Plans – (chemical)

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Crossovers

- Laboratory Fume cupboards
- Sprinklers - ELH – OH or EHH
- Sprinkler booster pumps – ICE's
- Standby Electricity Generators
- Fuel-fed burners

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Emergency Response Planning

- HSW HS Regulations
- HSW MHF Regulations
- FENZ FS, EP, and Evac Schemes Regs
- HSW General Workplace Regs
- Building Act

Which one are we working to? Why don't we cross or at least meet at the border?

Each Statute / Reg demand an ER Plan for different outcomes.

PCBU Confusion 101

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Certifiers Cover these areas.....

- Emergency Response Plan – HS Regs only
- Inventory of chemicals
- Training – chemical handling / stewardship
- Site Plans – chemicals – prescribed distances
- Safety Data Sheets – present, aligned to inventory actuals
- FENZ sent a copy of ER Plan

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Certifiers Cover these areas.....

- Deluge cage – LPG. Is in a test regime
- Signage – Gates Buildings Location etc
- Sources of Ignition controlled
- Electrical Dossier of rated plant and tests
- HS Stores FRR and distances
- Security of Chemicals



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Certifiers Cover these areas.....

- Compatibility or Otherwise
- Fire Extinguishers – Reqd for certain Regs
- Sprinklers – Compliance Plan app by Worksafe
- Conflict of Interest issues - Hard to manage while helping PCBU at the same time

Chemical Stewardship Versus Compliance Certification

Housekeeping – A real conflict for Compliance Certifiers.. They are not Workplace Inspectors and are engaged for ‘a set piece’



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- Specialist Chemical Emergency Advice
- NZ Industry Safety Data Sheets
- Chemdata – UK Emergency Service - technical
- US Homeland Security
- CHEMTREC – RCNZ / MoU – US Transport Emergency
- Emergency Services liaison
- Industrial Chemist contacts nationwide
- Hazardous Waste collection / incident response
- Subject Matter Experts All aspects of chemicals pan-lifecycle
- International Chemical Industry access and expertise

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Chemical Stewardship Expertise

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**Thank you for your time
today 😊**

Questions?