



**Footwear and Leather Industries
Health & Safety
Committee**

HAZARDOUS SUBSTANCES IN THE FOOTWEAR AND LEATHER INDUSTRIES

A COSHH guide



 <p>Control Of Substances Hazardous to Health</p>	<p>INTRODUCTION</p> <p>A huge range of substances and processes are used within the footwear and leather industries.</p> <p>Every day people at work are exposed to substances which may have a short term health impact such as:</p> <ul style="list-style-type: none">• Chemical burns• Breathing difficulties• Irritation of skin and eyes• Poisoning <p>There could also be long term effects:</p> <ul style="list-style-type: none">○ Cancer○ Liver and kidney disease○ Heart and lung disease○ Skin disease○ Allergies and sensitisation <p>What are hazardous substances? Hazardous substances include a wide range of items used in the workplace and can be described in any of the following forms:</p> <p>Liquids, solids, granules, dust, gas, slurry, vapour, smoke, fumes, waste products etc.</p> <p>However, hazardous substances can be generated from a process being undertaken.</p> <p>How do I recognise a hazardous substance? Every commercially obtained hazardous substance should be clearly labelled with what it is and must be marked with any warning signs and other information that tells you how it is hazardous.</p>
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	<p>Hazardous substances can be used in their natural form or in different ways in the workplace: Heated, cooled, boiled, frozen, sprayed, poured, painted, brushed, pressurised, mixed, machined etc.</p> <p>Hazardous substances are involved in several different workplace activities: Delivery, loading/unloading, transport, storage, issue/dispensing, usage and disposal.</p> <p>Hazards can also come from misuse of substances in the ways that they are: Used, stored, transported, spilled, cleaned up, mixed, diluted, washed off and disposed of.</p> <p>Exposure to hazardous substances health can occur in a number of different ways: Through contact (with the skin, eyes or mucous membranes), inhalation, ingestion (if swallowed or eaten), absorption through the skin or by injection.</p> <p>WHAT THE LAW SAYS</p> <p>Regulation 6 of the "Control of Substances Hazardous to Health Regulations 2002" states that: "an employer shall not carry out any work which is liable to expose any employees to any substance hazardous to health unless he has made a suitable and sufficient assessment of the risks created by that work to the health of those employees and of the steps that need to be taken to meet the requirements of these Regulations."</p> <p>WHAT IS A SUBSTANCE HAZARDOUS TO HEALTH UNDER COSHH?</p> <p>Under COSHH there are a range of substances regarded as hazardous to health:</p> <p>Substances or mixtures of substances classified as dangerous to health under the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 (CHIP).</p>
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These can be identified by their warning label and the supplier must provide a safety data sheet for them (as required under the REACH Regulations). Many commonly used dangerous substances are listed in the HSE publication "Approved Supply List".

Information approved for the classification and labelling of substances and preparations dangerous for supply" as part of the CHIP package. Suppliers must decide if preparations and substances that are not in the "Approved Supply List" are dangerous and, if so, label them accordingly.

Substances with workplace exposure limits are listed in the HSE publication "EH40/2005 Workplace Exposure Limits".

Biological agents bacteria and other micro-organisms, if they are directly connected with the work, such as with farming, sewage or healthcare, or if the exposure is incidental to the work (eg exposure to bacteria from an air conditioning system that is not properly maintained).

Any kind of dust if its average concentration in the air exceeds the levels specified in COSHH.

Any other substance which creates a risk to health, but for any other technical reasons may not be specifically covered by CHIP.

SAFETY DATA SHEETS

If a substance is identified as hazardous to health under COSHH, it must be supplied with a safety data sheet which contains all the relevant information regarding its safe use, for example: ingredients, safe usage and first aid.

With the new REACH Regulations, the format of safety data sheets has changed. Please refer to the FLIHSC document on REACH - (available on: www.britfoot.com, www.ukleather.org, www.community-tu.org) or www.hse.gov.uk/reach

	<p style="text-align: center;">CARRYING OUT A COSHH ASSESSMENT</p> <p>To ensure that any substance you use in the workplace does not, or will not, put staff or others at risk, all of the potential risks need to be assessed. The following steps show what is needed to do this:</p> <p>Step 1. Assess the risks to health from hazardous substances used in or created by your workplace activities.</p> <p>Step 2. Decide what precautions are needed. Work which could expose employees to hazardous substances should not be carried out without first considering the risks and the necessary precautions and what else needs to be done to comply with COSHH.</p> <p>Step 3. Prevent or adequately control exposure. Employees should be prevented from being exposed to hazardous substances. Where preventing is not reasonably practicable, it must be adequately controlled. The advice in this guidance note and other information it refers to will help in making correct assessments and putting the appropriate controls in place.</p> <p>Step 4. Ensure that control measures are used and maintained properly and safety procedures followed.</p> <p>Step 5. Monitor the exposure of employees to hazardous substances, if necessary.</p> <p>Step 6. Carry out appropriate health surveillance where your assessment has shown this is necessary, or where COSHH sets specific requirements.</p> <p>Step 7. Prepare plans and procedures to deal with accidents, incidents and emergencies involving hazardous substances, where necessary.</p>
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	<p>Step 8. Ensure that employees are provided with suitable and sufficient information, instruction and training.</p> <p>MONITORING AND HEALTH SURVEILLANCE</p> <p>Under COSHH, it is necessary to measure the concentration of hazardous substances in the air breathed in by workers, where the assessment concludes that:</p> <ul style="list-style-type: none">• There could be serious risk to health if control measures failed or deteriorated• Exposure limits might be exceeded, or control measures might not be working properly.• Air monitoring must be carried out when employees are exposed to certain substances and processes specified in Schedule 5 of the COSHH Regulations. <p>Where it is appropriate to carry out personal air monitoring, the air to be sampled is the space around the worker's face from where the breath is taken – ie the breathing zone.</p> <p>A record should be kept and maintained, for at least five years, of any exposure monitoring carried out</p> <p>Where an employee has a health record (required where they are under health surveillance, see Step 6), any monitoring results relevant to them as an individual must be kept with their health record. Employees should be allowed access to their personal monitoring record.</p> <p>More information on monitoring can be found in the HSE guidance "Monitoring Strategies for Toxic Substances".</p>
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COSHH REQUIRES HEALTH SURVEILLANCE TO BE CARRIED OUT WHERE:

- ◆ an employee is exposed to one of the substances listed in Schedule 6 of COSHH and is working in one of the related processes – eg manufacture of certain compounds of benzene and there is a reasonable likelihood that an identifiable disease or adverse health effect will result from that exposure.
- ◆ employees are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood under the condition of the work, of that disease or effect occurring and it is possible to detect the disease or health effect.

Health surveillance might involve examination by a doctor or a trained nurse. In some cases trained supervisors could, for example, check employees' skin for dermatitis, or ask questions about breathing difficulties where work involves substances known to cause asthma.

It is important that any employee requested to undergo health surveillance or monitoring fully co-operates with the employer for the sake of their health. This can be discussed with a health and safety representative or an employer. Health surveillance records must be kept for 45 years.

EMERGENCY PLANS

This will apply where the work activity gives rise to the risk of an accident, incident or emergency involving exposure to a hazardous substance, which goes well beyond the risks associated with normal day-to-day work. In such circumstances, you must plan your response to an emergency involving hazardous substances before it happens.



That means preparing procedures and setting up warning and communication systems to enable an appropriate response immediately any incident occurs and ensuring that information on your emergency arrangements is available to those who need to see it, including the emergency services. It also requires these safety drills to be practised at regular intervals.

These requirements must be complied with in full where either carcinogens, mutagens or biological agents are used.

COMMON SUBSTANCES USED OR CREATED IN THE FOOTWEAR AND LEATHER INDUSTRIES

Substances used directly in work activities eg adhesives, paints, cleaning agents, solvents, dyes, finishes, acids, alkalis, isocyanates, filling agents, mineral salts (including chrome and zirconium), anti mould agents.

Substances generated during work activities (eg dust and fumes).

INFORMATION, INSTRUCTION AND TRAINING

COSHH requires that employees must be provided with suitable and sufficient information, instruction and training which should include:

- the names of the substances they work with or could be exposed to and the risks created by such exposure and access to any data sheets that apply to these substances
- the precautions they should take to protect themselves and other employees



- how to use personal protective equipment and clothing provided
- results of any exposure monitoring and health surveillance (without giving individual names)
- emergency procedures which need to be followed

The information, instruction and training should be updated to take account of significant changes in the type of work carried out or work methods used.

Information should be provided that is appropriate to the level of risk identified by the assessment and in a manner and form in which it will be understood by employees.

These requirements are vital. It should be ensured that employees understand the risks from the hazardous substances they could be exposed to. Control measures will not be fully effective if employees do not know their purpose, how to use them properly, or the importance of reporting faults.

Employees and Safety Reps

Consulting with trade union-appointed safety representatives (see Safety Reps and Safety Committee Regulations 1977) or other employee representatives (see Health & Safety Consultation [with employees] Regulations) is a legal requirement. Working with safety representatives and employees' representatives is a very useful means of communicating on health and safety matters in the workplace.

Remember: involving employees in decisions can help to foster closer working relationships and make employees more receptive to new ideas.

	<p>USEFUL PUBLICATIONS</p> <p>HSE publication "Control of Substances Hazardous to Health Regulations 2002 (COSHH)" page 15.</p> <p>FLIHSC publication "REACH - a guidance note for the footwear and leather industries" available at: British Footwear Association www.britfoot.com UK Leather Federation www.ukleather.org Community www.community-tu.org</p> <p>HSE www.hse.gov.uk/reach/</p> <p>SATRA www.satra.co.uk</p> <p>UKLF www.ukleather.org</p> <p>FIHSC "Isocyanates – a guide for the footwear industry" 1998 info@britfoot.com</p> <p>Chemical Hazards Communication Society http://www.chcs.org.uk/safety-data-sheets.htm</p> <p>MSDS Solutions http://www.msds.com/</p> <p>HSE "COSHH Essentials" www.hse.gov.uk/COSHH/index.htm</p>
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APPENDIX 1. EXAMPLE OF A USER SURVEY

COSHH - Control Of Substances Hazardous to Health - Do you know about and are you suitably protected from the hazardous substances that are in use in your workplace?

What are "Hazardous Substances"?

Hazardous Substances include a wide range of items used in the workplace and can be described in any of the following terms:-

Chemicals, liquids, solids, granules, dust, gas, vapour, smoke, fumes, radiation, light, waste products etc.

How do I recognise a Hazardous Substance?

Every Hazardous Substance should be clearly labelled with what it is and must be marked with any warning signs and other information that tell you if and how it is hazardous, such as:



They can be used in their natural form or in different ways in the workplace:-

e.g. Heated, cooled, boiled, frozen, sprayed, poured, painted, brushed, pressurised, mixed, machined etc.

They are involved with several different workplace activities:-

Delivery, loading/unloading, transport, storage, issue/dispensing, usage and disposal.

Hazards can also come from misuse of substances in the way that they are:

Used, stored, transported, spilled, cleaned up, mixed, diluted, washed off and disposed of.

If you are exposed to hazardous substances wrongly, they can affect your health in a number of different ways:-

e.g. Through contact (with the skin, eyes or mucous membranes), inhalation, ingestion (if swallowed or eaten), absorption (through the skin) or by injection.

What do you need to know?

It is therefore important that everyone in the workplace who works with, or can potentially be exposed to Hazardous Substances, is aware of the nature of these substances and their hazards and knows how to protect their own and others' health and safety against them.

The following survey has been designed to check out your level of awareness on this important subject:-

HAZARDOUS SUBSTANCES IN THE FOOTWEAR & LEATHER INDUSTRIES

Name: _____ **Job role:** _____

Please answer the following questions to the best of your knowledge – if you 'don't know' an answer – please say so because this information is important too.

1. Do you know what types of substances or chemicals you are exposed to at work?

Yes, I know what they are No, I don't know what they are There are none

2. If yes, what are they? Please list them on Table 1 attached.
If not, go and see your supervisor and explain about this problem.
If there are none you can stop this survey now and hand in your form. Thank you.

3. Do you know if any of the listed substances are hazardous to you?

Yes No Don't know

Tick the ones on Table 1 that you know to be hazardous in some way.

4. Do you know **how** it is hazardous to you – write on Table 1 what hazard it represents. For example: chemical burn, toxic/poisonous, flammable, affects breathing, skin damage, carcinogenic or otherwise bad for your health. **If you don't know, one good source of information is the Materials Safety Data Sheet which your employer should have.**

5. How are you currently protected from the hazard?
For example: using PPE such as gloves, goggles, face mask, special clothing, or it is safely contained, extracted or otherwise kept away from you, are there special working methods or safe systems of work? Write your answers onto Table 1.

6. Do you think that the current level of protection that you have from the hazard is good enough?

Yes No Don't know

Mark on Table 1 the substances that you think you are not sufficiently protected against.

7. Which of your work activities, that involve substances or chemicals, do you feel are currently unsafe or unhealthy? Please list them on Table 2 and say why.

8. What are the chances, do you think, of you having an accident or health problem with each of these activities? Score each one High, Medium or Low, H, M or L?

9. What do you think should be done about these problems to make them safe? Write your suggestions on the list.

10. Does your supervisor know about these problems? – again mark the list on Table 2.

HAZARDOUS SUBSTANCES IN THE FOOTWEAR & LEATHER INDUSTRIES

11. What aspects of the use of hazardous substances in your workplace would you like to know more about?

12. Are you aware of your company's COSHH assessments?

TABLE 1 – Awareness of substances in use and their hazards.

Substance or chemical name	Is it Hazardous? (Tick)	How is it hazardous?	How you are currently protected from this hazard?	Protection good enough? Cross if not.

TABLE 2 – Work Activities involving Hazardous Substances and their problems.

Activity	Why it is unsafe or unhealthy?	Chances of accident or ill-health?	Your suggested solution to this problem.	Is your supervisor aware of these problems? Tick or cross.
		H - M - L		
		H - M - L		
		H - M - L		
		H - M - L		
		H - M - L		

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This document is available on the following websites:

British Footwear Association – www.britfoot.com

UK Leather Federation – www.ukleather.org

Community – www.community-tu.org