

November 2012

## Submission on the Strategic Review of the Workplace Health and Safety System

To the Independent Taskforce on Workplace Health and Safety  
(Address [secretariat@hstaskforce.govt.nz](mailto:secretariat@hstaskforce.govt.nz))

### Introduction

1. This submission is from;

Certification Board for Inspection Personnel (CBIP),  
P O Box 8056,  
NEW PLYMOUTH

2. The contact person for CBIP is \_\_\_\_\_, who may be contacted by e-mail at \_\_\_\_\_ or Amelia De Ridder (Business Manager) who may be contacted at email by \_\_\_\_\_
3. CBIP, established in the early 1980's, is responsible for providing certification for inspection personnel following competency and examination assessment. CBIP certified inspectors carry out inspections where a high safety focus is required.
4. CBIP is an independent, non-profit making Incorporated Society of which all certificate holders are ordinary members, and it operates under recognition from the Ministry of Business, Immigration and Employment as a Qualification Issuing Agency under the Health and Safety in Employment (Pressure Equipment, Cranes and Passenger Ropeways) Regulations.
5. Governance of CBIP is by a Board of Directors, who are responsible for establishing and maintaining policies with regards to the administration, rules, functions, standards, and fees of the society and the certification schemes offered.
6. CBIP holds accreditation issued by JAS-ANZ as a conformity assessment body providing personnel certification services.
7. CBIP currently issues certification for inspectors in the following disciplines, and is able to add certification schemes as the need arises:
  - Coatings
  - Cranes
  - Elevating work platforms
  - Lifts, escalators and moving walkways
  - Non-destructive testing
  - Passenger Ropeways
  - Pressure equipment
  - Welding.

## General

8. CBIP supports the Government's initiative in establishing the strategic review of the workplace health and safety systems in NZ, and appreciates the opportunity to make this submission to the Taskforce. CBIP is available to undertake further discussion with the Taskforce, and/or provide any relevant information or comment which will assist the Taskforce to develop its recommendations.

## Submission.

CBIP wishes to make comment on one aspect of the Discussion Paper, which relates to the role which CBIP, and other like bodies, can play to assist in the delivery of health and safety objectives in NZ.

Question Number	Issue	Comment
6	Regulators' roles and responsibilities – improving effectiveness	<p>CBIP notes that the Ministry of Business, Innovation and Employment (MBIE) plans to have significantly more inspectors available to visit and monitor workplaces, which is a response to the increased MBIE funding and in response to the Government's target of a 25% reduction in the workplace fatality and serious injury rate.</p> <p>CBIP submits that MBIE's role as the health and safety regulator, and its inspection effectiveness, can be enhanced by the recognition and use of expertise available within the private sector. CBIP recommends that recognition should be provided to independent inspectors, as is current practice but which can be extensively increased, for inspections of safety critical plant and equipment to ensure that it is safe for workplace use. There are a number of existing options for dealing with advice and inspections at workplaces, including;</p> <ul style="list-style-type: none"> <li>• Health and Safety Representatives</li> <li>• Consultants</li> <li>• Trade and Industry Associations</li> <li>• In-house H&amp;S advisors</li> <li>• Independent inspection and certification of critical plant and processes.</li> </ul> <p>Of the above, Health and Safety Representatives and requirements for some inspection and certification of critical plant and processes already exist, e.g.;</p> <ul style="list-style-type: none"> <li>• Inspection and certification of pressure equipment, cranes and passenger ropeways.</li> <li>• Inspection and certification of certain hazardous substances locations and stationary containers.</li> <li>• Certain prescribed electrical work and high voltage installations</li> <li>• Certain gasfitting work.</li> <li>• Electrical equipment on construction and demolition sites</li> </ul>

		<p>In addition employees performing certain specified work must hold a certificate of competence, e.g.;</p> <ul style="list-style-type: none"> <li>• Asbestos workers</li> <li>• Divers</li> <li>• Electrical</li> <li>• Gas</li> <li>• Boiler operation</li> <li>• Equipment inspectors</li> <li>• Building</li> <li>• Scaffolders</li> </ul> <p>CBIP submits that regulators should not be directly issuing certificates of competence, but should be recognising 'Qualification Issuing Agencies' as MBIE does under the Health and Safety in Employment (Pressure Equipment, Cranes and Passenger Ropeways) Regulations, e.g. CBIP is recognised to certify pressure equipment inspectors and other inspectors.</p> <p>To further support this model and improve workplace safety, tools and equipment which can be classified as 'high risk' should be identified and an inspection and certification regime established if it is not already required. Equipment already requiring inspection and certification is listed above, but additional high risk equipment could include, for example;</p> <ul style="list-style-type: none"> <li>• Elevating work platforms, combination EWP/crane units, and forklifts with cages.</li> <li>• Hoists and fixed gantries (e.g. as used for lifting logging trailers)</li> <li>• Rigging and lifting equipment, e.g. container spreader beams.</li> <li>• Vehicle hoists (and other plant supporting loads under which people pass or work)</li> </ul> <p>Such equipment would then require inspection and certification or tagging by recognised private sector inspectors. MBIE inspectors would then need only to check that equipment had current certification.</p> <p>The Health and Safety in Employment (Pressure Equipment, Cranes and Passenger Ropeways) Regulations 1999 (PECPR Regulations) are now overdue for review and amendment. CBIP submits that the PECPR Regulations be urgently reviewed, particularly to include additional high hazard plant, and also to clarify what equipment is covered by the regulations as there is confusion regarding whether certain equipment is covered or not.</p>
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Governance Board Chairman  
on behalf CBIP Governance Board