



# Strategic Review of the Workplace Health and Safety System

## Submission template

This template can be used to make a submission to the Independent Taskforce on Workplace Health and Safety. The template does not limit the length of your answers, and you can attach documents to supplement your answers if you wish. Alternatively, you can use the on-line questionnaire to make a submission, which can be found at [www.hstaskforce.govt.nz](http://www.hstaskforce.govt.nz). The on-line questionnaire restricts the length of your answers to about 300 words per question.

Please refer to the taskforce's consultation document, *Safer Workplaces* before completing this template. The consultation document can be found at [www.hstaskforce.govt.nz](http://www.hstaskforce.govt.nz)

### About you

\* Indicates mandatory questions

#### 1. \*Your full name:

SHELDON DRUMMOND

#### 2. \*Is this submission on behalf of an individual or an organisation?

☐ Individual ☒ Organisation

Name of organisation: Forest Owners Association

#### 3. \*Region

- |                                                 |                                                   |                                                       |
|-------------------------------------------------|---------------------------------------------------|-------------------------------------------------------|
| <input checked="" type="checkbox"/> Northland   | <input checked="" type="checkbox"/> Whangarei     | <input checked="" type="checkbox"/> Auckland          |
| <input checked="" type="checkbox"/> Waikato     | <input checked="" type="checkbox"/> Bay of Plenty | <input checked="" type="checkbox"/> Gisborne          |
| <input checked="" type="checkbox"/> Hawke's Bay | <input checked="" type="checkbox"/> Taranaki      | <input checked="" type="checkbox"/> Manawatu-Wanganui |
| <input checked="" type="checkbox"/> Wellington  | <input checked="" type="checkbox"/> Marlborough   | <input checked="" type="checkbox"/> Nelson            |
| <input checked="" type="checkbox"/> West Coast  | <input checked="" type="checkbox"/> Canterbury    | <input checked="" type="checkbox"/> Otago             |
| <input checked="" type="checkbox"/> Southland   | <input checked="" type="checkbox"/> Overseas      |                                                       |

#### 4. \*Respondent category

- |                                                             |                                                         |
|-------------------------------------------------------------|---------------------------------------------------------|
| <input type="checkbox"/> Employer                           | <input type="checkbox"/> Not in paid employment         |
| <input type="checkbox"/> Manager                            | <input type="checkbox"/> Occupational health nurse      |
| <input type="checkbox"/> Employee                           | <input type="checkbox"/> Health and safety practitioner |
| <input type="checkbox"/> Self-employed                      | <input type="checkbox"/> Other:                         |
| <input checked="" type="checkbox"/> Employee representative |                                                         |

Industry association

#### 5. \*Which type of industry do you manage, own a business in, or work in?

- ☐ Agriculture
- ☒ Forestry
- ☐ Fishing
- ☐ Mining
- ☐ Manufacturing
- ☐ Electricity, Gas, Water and Waste Services
- ☐ Construction
- ☐ Wholesale Trade
- ☐ Retail Trade
- ☐ Accommodation and Food Services
- ☐ Transport, Postal and Warehousing
- ☐ Information Media and Telecommunications
- ☐ Financial and Insurance Services
- ☐ Rental, Hiring and Real Estate Services
- ☐ Professional, Scientific and Technical Services
- ☐ Administrative and Support Services
- ☐ Public Administration and Safety
- ☐ Education and Training
- ☐ Health Care and Social Assistance
- ☐ Arts and Recreation Services
- ☐ Other Services

#### 6. \*Size of business that you own / manage or work for?

- |                                          |                                                    |
|------------------------------------------|----------------------------------------------------|
| <input type="checkbox"/> Self employed   | <input type="checkbox"/> 20-49 employees           |
| <input type="checkbox"/> 1-5 employees   | <input type="checkbox"/> 50-99 employees           |
| <input type="checkbox"/> 6-9 employees   | <input checked="" type="checkbox"/> 100+ employees |
| <input type="checkbox"/> 10-19 employees |                                                    |

---

**7. Gender**

☐ Male ☐ Female ☐ Other

---

**8. Age**

- |                                |                                |
|--------------------------------|--------------------------------|
| <input type="checkbox"/> 15–24 | <input type="checkbox"/> 45–54 |
| <input type="checkbox"/> 25–34 | <input type="checkbox"/> 55–64 |
| <input type="checkbox"/> 35–44 | <input type="checkbox"/> 65+   |

---

**9. Ethnicity**

- |                                         |                                                                |
|-----------------------------------------|----------------------------------------------------------------|
| <input type="checkbox"/> NZ Maori       | <input type="checkbox"/> Asian                                 |
| <input type="checkbox"/> European       | <input type="checkbox"/> Middle Eastern/Latin American/African |
| <input type="checkbox"/> Pacific Island | <input type="checkbox"/> Other ethnic group                    |
| <input type="checkbox"/> Other European | <input type="checkbox"/> Do not wish to indicate               |

---

**10. Your contact details**

Phone number(s)

Email address:

---

**Please tick the boxes below as appropriate**

☒ I consent to my submission being placed on the Independent Taskforce on Workplace Health and Safety website

☐ I would like my name withheld from publication (submissions from individuals only)

Please note that your name and contact information, including any personal information, is being collected so that the Independent Taskforce on Workplace Health and Safety can publish the names of people and organisations who or that made submissions, follow up with a respondent if any submission needs clarification, and for the general purposes of the Strategic Review of the Workplace Health and Safety System. The Independent Taskforce on Workplace Health and Safety is the intended recipient and holder of the information and can be contacted at PO Box 3705, Wellington, New Zealand. In accordance with Privacy Principle 7, you have the right to access and correct any personal information you provide.



## Submission template questions

Please answer the following questions and feel free to attach any supporting documents.

**If you are completing the template on paper**, please feel free to add other pages but make clear which questions your answers refer to. **If you are completing the template electronically** and need more space for any of your answers, please write the rest of your answer into another document, making clear which question your answer refers to, and attach it when you send your completed submission template to us. The answer fields below hold approximately 430 words.

---

### Who gets hurt, killed or suffers from ill-health or disease as a result of work?

1. What do you think is driving the differences in health and safety outcomes for different demographic groups?

We believe the differences in outcomes can be attributed to two different criteria: the first being the degree to which those demographic groups are represented in hazardous sectors, and the second being the degree to which those sectors are targeting hazards with safety initiatives.

In the forestry sector a large proportion of the workforce is of Maori descent, the work is hazardous, and therefore it follows that workers in such a sector will feature higher in the injury toll than workers employed in an office or a shop. Maori are probably over represented in forestry and similar physically demanding roles, for example shearing, and as a consequence become over represented in the injury statistics.

The forestry sector also has a small business component, ranging from novice contractors through to the farm forestry sector. Their reasons for sustaining injuries probably relate to a lack of safety expertise within the business and also a lack of resources to purchase expertise, hence the lone farm forester attempts tasks well beyond their capability e.g. felling trees.

Both MBIE and ACC provide printed resources on safety but given the hazardous nature of the work this is a sector that needs face-to-face guidance from experts.

2. What changes are needed to the workplace health and safety framework to improve outcomes for demographic groups with higher than average rates of injury and illness?

The forestry sector has developed a comprehensive safety culture model that says that there are 12 elements that must be addressed in a forestry operation if the business is to be safe and productive. The 12 elements embrace: Management's Leadership Commitment for Safety; Safety Systems and Procedures; Communication; Training and Competency; Rewards; Resources; Continuous Learning; Work Pressure; Risk Taking; Relationships; Investigating and Reporting; and Worker Involvement.

It is the forest owners' view that tackling these elements in a forestry business will address the injury toll regardless of the demographics of the industry, but the messages and the approach may need to be modified to take account of the demographics.

Addressing the injury toll in New Zealand however cannot be left to just industry sectors and it is important that MBIE and ACC shoulder a share of the resourcing requirements to allow the development and delivery of interventions, like the safety culture initiative, which are for the benefit of the wider community.



---

## Regulatory framework

### 3. What do you think the challenges are with the current health and safety regulatory framework?

The approach of the NZ regulatory framework allows a great deal of flexibility in finding ways to achieve all practicable steps and in that respect supports innovation, however such an approach is really only suitable when there are knowledgeable people leading safety.

To help bridge the gap between all practicable steps and people's ability to complete all practicable steps MBIE produce Approved Codes of Practice with respective industry groups.

In forestry we have an ACoP, which helps bridge the gap between those who can manage safety and those who are struggling, but a recent survey by NZFOA and ACC, found that there was significant non-compliance with the ACoP in the breaking out task, and forest owners have developed an initiative to address this problem. The forestry sector is working to address this issue through a certification approach which is being trialled in breaking out in cable logging operations and is further discussed in Q.4

It is likely that there is widespread non-compliance with ACoPs in other sectors as well, and some sectors don't even have an ACoP, so finding a solution to this problem is very important if safety in New Zealand is to be improved.

With regards to small businesses, like the farm forestry sector, they simply do not have the expertise to complete all practicable steps requirements, and would be better served by a more prescriptive approach.

### 4. How do you think the health and safety regulatory framework could be improved?

The forest owners have identified that there is a gap in the current system: legislation, regulation, ACoP and Best Practice Guidance, and are seeking to address this problem with a certification initiative. This initiative attempts to bring the guidance in the ACoP to life in the field. It includes a package of resources and field visits, to assist forestry contractors to get up to speed on safety performance.

This approach to safety is intensive, and could have benefits for other hazardous sectors. It involves taking the knowledge of the most competent people in the sector and putting it into a certification programme that allows the most inexperienced contractor to take advantage of that expertise. Initial discussions have been held with MBIE and ACC, and they have an interest in the work, but what is needed most is funding assistance to allow this innovative initiative to be appropriately trialled and evaluated.



## Regulators' roles and responsibilities

### 5. How effective are the regulators in influencing workplace health and safety outcomes?

MBIE influence outcomes through their inspection activity and their enforcement programmes. ACC influence outcomes through their incentive programmes. Both regulators are involved in the Forestry Sector Action Plan 2010 to 2013 in conjunction with the forestry sector.

With regards to MBIE it is important that enforcement is consistent across the country, and also that there is sufficient resource to respond to incidents appropriately. MBIE should investigate all serious harm reports personally, rather than relying on the contractor to send in a report.

To this end, MBIE needs to ensure that the Forestry Inspector directorate is adequately populated with suitably experienced and remunerated persons and structured in a way that enables them to undertake their enforcement, education and investigation responsibilities effectively. It is really important that the tyranny of distance is considered. This is an important point. A forestry inspector may have to travel up to four hours a day to visit a forestry contractor or work site. This is quite different to a construction or manufacturing inspector who visits sites within 20 or 30km of their base. These travel constraints need to be addressed within MBIE or we fear the forestry capability of the organisation will continue to be eroded.

With regards to ACC, the incentive programmes are supported but often the cost of being in the programme (consultant's fees etc.) is higher than the discount. This means that to be of value the incentive programme has to add real safety value to the business. There is anecdotal evidence however that in some cases, businesses are both getting a discount from ACC for good systems, and paying an experience rating cost, because their performance is not as good as others in the same sector. This would suggest that the WSMP programme needs an overhaul.

### 6. How could the regulators' roles and responsibilities be changed to improve their effectiveness in influencing workplace health and safety outcomes?

The Workplace Health and Safety Council has an influential role in health and safety and it would be good to see representatives from the hazardous sectors represented on that organisation. Forestry, fishing, agriculture, manufacturing and road freight are all in the frontline of the war on injuries and it would be appropriate for them to have a seat at the table.

ACC and MBIE share injury data but there is no evidence that MBIE proactively act on any of the information that is passed to them to target poor performing businesses. There is substantial under reporting of Serious Harm, and this could be addressed by MBIE following up on some of the ACC entitlement claims that suggest a serious injury has occurred. MBIE however need to be resourced to do this work.

There is a need for pro-active injury prevention as was the case with the ACC Safer Industry Programme. This programme targeted forestry, fishing, agriculture, road freight and construction with funding and interventions. Of late the programme seems to have lost direction and momentum, and the forestry sector believe there is a need to establish a pool of funding for each of the specified sectors, potentially 5% of the injury toll account for the sector, to be spent on agreed, joint interventions. While it could be argued that such a funding model is not sustainable, the view of the forestry sector is that it is the injury cost that is not sustainable.



## New Zealand's changing workforce and work arrangements

### 7. What impacts are New Zealand's changing workforce and work arrangements having on health and safety outcomes?

Although your discussion document indicates that emphasis is moving away from industry sectors like forestry this is in fact not correct, with forestry expecting to grow in size in the coming years.

The majority of the work in forestry is contracted out, and extra hours are worked to meet the demands of the customer, which is probably true in every market based operation in New Zealand.

The forestry sector is aware of the impact an increase in demand has on crew members, and their families, and does try to find solutions to these problems. Work pressure for example is one of the cultural elements that crews are encouraged to address on their site; but finding solutions is challenging. It might be for example that a crew can work an hour or two extra a week in the summer months, to meet targets, and in doing so, avoid having to work weekends, which is much more disruptive to their lifestyle.

MBIE has an important role to play in ensuring that where work conditions are substandard, that they take action. A TV One newscast recently highlighted this very issue where a number of restaurants in Auckland were paying below the minimum wage. The investigative journalist drew this to the attention of MBIE who investigated. A follow up programme a few weeks later by TV One, showed that none of the restaurants had been prosecuted but instead MBIE was going to work with them to try to improve their compliance. MBIE's reason was that taking a prosecution would be too difficult under the current legislation ñ so perhaps the law needs to be strengthened to protect vulnerable workers as a first step in the process.

A variation on the safety culture initiative used in the forestry sector is also worthy of consideration as a way to get people involved in safety.

### 8. What changes to the health and safety framework, if any, are needed as a result of the changing workforce and work arrangements?

The forestry sector, through FITEC and with assistance from ACC, investigated ways to get novice workers up to speed quickly so that they would be safer. The initial project looked at tree falling and used a researcher from COHFE to identify ways in which a better quality induction, with appropriate follow up, could result in a safer outcome for the novice worker.

The research showed that the experienced worker and the novice worker tackled the task differently, and that changing the training of the novice worker, to better align their task approach with that of the experienced worker, could improve safety. This smarter induction ñ training could be applied in other tasks, and potentially other sectors, with the same effect. Funding however is needed for the work.

There is also a need for far more enforcement for those businesses that are not meeting their legal obligations. This is not just about a level playing field, because a level playing field only considers the business elements of the breaches ñ those not meeting their obligations have lower costs. We believe this is about the moral issue of tackling businesses that are putting life at risk and need to be challenged by the authorities responsible for protecting life.



---

## Worker participation and engagement

9. How effective do you think worker participation is in improving workplace health and safety in New Zealand?

Worker participation in health and safety is very important for driving improvement. To get workers participating in safety, the forestry sector uses the safety culture programme. This is being rolled out in the forestry sector and requires each crew member to fill in an assessment form giving their views on things in their crew that good, and things that are not done well. The assessments are analysed by a consultant and the results are taken back to the crews, with areas that need attention highlighted in red or amber. The crews then agree a project amongst themselves to drive change, and implement it with support from the forest owner.

This is a valuable way of tackling worker participation but it needs support from government agencies to make it happen across the country.

10. What improvements can be made to worker participation in workplace health and safety so as to get better workplace health and safety outcomes?

The safety culture initiative in forestry is a good starting point for other sectors to follow. The forestry sector also developed a set of behavioural standards for the task of breaking out, which details the different roles in the task (breaker out, head breaker out, hauler operator, and contractor), and what each of those roles requires you to do to keep yourself, and those you work with safe. This includes things like obeying the rules, speaking up, reporting near hits etc.

This is another forestry initiative that could have benefits for other sectors.



## Leadership and governance

11. To what extent do directors and other senior leaders provide effective leadership and governance of workplace health and safety?

In the forestry sector we have the NZFOA Health, Safety and Training committee which leads safety on behalf of the sector. The committee is chaired by a senior manager from a participating forestry company; and the NZFOA board, which is made up entirely of senior sector managers, takes an active interest in the committee initiatives and the outcomes.

The committee itself is made up of senior health and safety managers from forestry companies and the work programme for the committee is publicised in a fortnightly update, and at quarterly meetings. There is also an annual health and safety award event organised by FITEC, the industry ITO, recognising the best safety initiative in the sector for the previous year.

Each forest owner has a dedicated manager who leads safety and some of these managers, through their involvement in delivering out NZFOA initiatives, have a very high profile within their companies and the sector. Their action demonstrates the importance that safety is given by the forest owner, and that message is picked up on by the contractors and crews.

Outside of the forestry sector however there are some disappointing examples of safety messages from leaders, where there seems to be a belief that safety is about wrapping people up in cotton wool and stopping them from gaining any experience of life.

These messages, when they are published, need to be challenged; as they are by the HSE in Great Britain. Unfortunately in New Zealand, they go unchallenged by both MBIE and ACC.

12. What improvements can be made to directors' and other leaders' participation in workplace health and safety, so as to get better workplace health and safety outcomes?

Probably the biggest improvement would come from having the directors of public companies report on their safety performance during the past year, but finding a reason for their customers to take any interest would be a real challenge. Some detail their journey towards zero harm in their annual reports, but most don't.

Ultimately directors will only lift their performance in safety areas in relation to customer and shareholder pressure; note how many businesses list their environmental performance in the annual report because customers and shareholders want to know about it. With regards to safety performance, there is little or no pressure to provide such information at this time.

The threat of prosecution would also sharpen the focus of directors on safety.



---

## Capacity and capability of the workplace health and safety system

13. To what extent do firms have the capacity and capability to effectively manage workplace health and safety issues (including through accessing external resources)?

Forest owners have the knowledge and expertise in-house to manage safety issues. NZFOA's 20 largest members are large enough to have the financial resources to engage consultants when required. The expertise held by individual forest owners is shared collectively, through things like the NZFOA Health, Safety and Training committee, and also used to assist contractors to manage safety.

As a group the NZFOA has undertaken many safety initiatives and manages the Forestry Sector Action Plan. This has considerably added to their knowledge and expertise ñ for example the safety culture work and the breaking out certification programme.

Where there is a lack of ability to manage safety, is where the businesses are much smaller, for example the farm forestry sector, and generally they do not have the resources to engage consultants.

The forestry sector are incredibly generous in sharing their expertise, recognising that much of it comes from public funding, and to that extent a mentoring / experience sharing type programme for safety performance could be a good initiative. At the moment there is a lack of a forum for such work notwithstanding the Business Leaders Forum.

14. What options are there for improving firm level capacity and capability to deliver better health and safety outcomes?

The forestry sector has an active contractor group called the Forest Industry Contractors Association, which provides advice to its members, including safety advice. Individual firms who belong have access to considerable expertise.

The farm forestry sector has an over arching body, the NZ Farm Forestry Association (NZFFA), which could assist individual farm forestry businesses with safety requirements; however there is a lack of demand for the service. This is because safety performance for the self-employed business sector does not appear to be actively targeted by any government agency.



---

## Incentives

15. How effective are existing financial and non-financial incentives in improving workplace health and safety outcomes?

Financial incentives are a good tool but they need to be worth more than they cost. To join the ACC WSD programme a contractor has to attend a half day approved workshop and then complete an assessment. There is some flexibility in the workshop attendance but if required to attend it the contractor will have to leave his business for probably a day. This is a cost to the business. The assessment might take several hours to complete and the final discount might only be a few hundred dollars.

The WSMP programme requires completion of a systems based audit tool that often requires assistance from a consultant and could cost you more than your potential discount.

There is also an issue with the WSMP programme in as much as it determines that you have systems in place but not how well you are managing safety.

16. How could incentives be better used to improve workplace health and safety outcomes?

The forest owners would like to suggest two changes to the current incentive programmes. The first is that there be recognition for safety culture work, in particular incorporating a safety culture survey into the WSMP type assessment, and that there be recognition for achieving a higher level of safety compliance performance; namely certification.

The safety culture survey provides an insight into how well safety is being led in a business and this is an important indicator of the likelihood of injuries. The certification information will provide a clear indicator of how far down the zero harm journey the business has progressed. These types of options need to be investigated.



---

## **Influencing health and safety outcomes beyond one's own workplace**

17. How successful are government, industry, corporate or other potentially influential bodies in influencing health and safety outcomes beyond their own workplaces (for example through influencing their suppliers, counterparts, and competitors)?

Obviously with the principal / contractor relationship that exists in forestry, the forest owners are very successful in influencing the safety performance of contractors. Through the development of interventions that have widespread applications, for example the drug and alcohol programme in forestry, the forest owners have also influenced other workplaces (shared resources).

18. What could be done to get government, industry, corporate or other potentially influential bodies to exert greater influence on improving workplace health and safety outcomes beyond their own workplaces?

Where there is a direct principal / contractor relationship, this is easily achieved. Outside of this there is interest in initiatives that have been really successful but only an informal network to share them. The forestry sector has had leaders from other sectors come and talk to them about initiatives, and there has been real value and learning in this work.



---

## Major hazards

19. How strong is New Zealand's current approach to regulating major hazards?

Where there are hazardous operations that could, through an accident, have a catastrophic impact on the people working on the site, or the surrounding neighbours and environment, there is a need for rigorous inspection and enforcement. This approach has not been present in New Zealand in recent years.

20. What improvements to the regulation of major hazards would lead to better health and safety outcomes?

There needs to be regular and comprehensive inspections of all sites that are responsible for the management of major hazards and some assessment of their pro-active safety initiatives. This could include a requirement to be involved in safety culture work, certification, etc.



---

## Health and hazardous substances

21. What are the most significant challenges to managing occupational health risks and exposure to hazardous substances?

For the forestry sector one of the health risks is musculoskeletal disorders due to the physical and repetitive nature of the tasks. Forest owners have teamed up with ACC to put physiotherapists into the field and to try to find solutions to the problem. This included a series of exercises designed for the sector, to balance the overuse problem, taking breaks, etc. The problem can be managed but only with difficulty due to the remote nature of the sites

22. What changes could be made to the existing health and safety framework to reduce the harm caused by occupational disease and ill-health?

Initially there is a need for a focus on these hazards and better information on how to measure and manage them. Most sectors have focussed on dealing with traumatic injury, so tackling gradual process type injuries requires quite a mind shift.

In addition to information there may also be a need for some practical hands-on assistance. This could be by way of workshops or support in the field.



## Small to medium-sized enterprises

23. What workplace health and safety challenges are specific to the self-employed and small-to-medium enterprises?

Most small businesses, like a farm forestry operation, are very focussed on the actual work they do and that effort tends to take up their entire time. They do not have access to safety expertise and may not even be aware they need it. When it comes to completing tasks that might be hazardous, they do not have access to people to assist them with the task; generally they will not call upon paid assistance, and usually they just give it a go themselves. They then frequently get into trouble.

The forest owners are seeking to integrate the farm forestry sector into the wider forestry sector and this will see the farm forestry sector getting better access to health and safety advice.

More broadly, there is a clear mismatch between what the government provides and what the market wants. The government is focussed on using technology to deliver solutions – for example resources on the internet, but groups like the farm forestry sector want face-to-face contact.

24. What improvements could be made to the workplace health and safety framework, and its implementation, to ensure that it's effective for self-employed and small-to-medium sized enterprises?

One thing that would assist in improving safety would be to make compliance requirements easier to understand. Small businesses struggle with the 'all practicable steps' requirement and have a preference for clear instruction on what to do. MBIE is reluctant to provide specific advice but that is what is needed. Perhaps it could be in the form of very detailed ACoP type publications. There also needs to be pressure on small businesses to get advice and this requires the real possibility of a compliance visit.



## Measurement and data

25. To what extent are New Zealand's workplace injury and occupational disease data collection mechanisms conducive to robust monitoring, investigation and comparative analysis?

The largest collection of injury data is held by ACC but this data is collected for insurance purposes, rather than injury prevention purposes. When you analyse the data from a forestry perspective, looking for injury prevention options, there is a substantial amount of information on age, ethnicity, injury classification etc., but little or no information on what the person was doing and what went wrong. From an injury prevention point of view therefore the data collected by ACC has to be further analysed to provide any useful information. This requires the use of data mining techniques to find out what happened.

The MBIE database provides more detailed data on Serious Harm events, but the database is the victim of serious under reporting, and does not have any data on non-reportable injuries, like sprains and strains. which collectively add up to a substantial problem.

The NZFOA has their own database called IRIS to which individual forest owners contribute their injury and near hit data. This is the most comprehensive database of forestry incidents and the best database for determining injury prevention interventions.

To get the complete picture of what is happening in forestry (or any sector) it is necessary to query all three databases, as each database has different information. Information on costs and gradual process claims is only available from the ACC database for example.

26. What opportunities are there for improving data collection, integration and reporting?

From the forest owners' perspective it would be good to have an annual report produced that analysed the three databases: the IRIS, MBIE and ACC databases, and from that work, have clearly identified injury prevention options and injury trends. This could be done for forestry, agriculture, fishing, manufacturing and road freight, although obviously only forestry has their own database to include in the mix.

From such reports it would be much easier to measure the annual injury toll and raise awareness of the issues.



---

## Our national culture and societal expectations

27. Do you think New Zealand culture influences our workplace health and safety outcomes?

There have been a number of accidents where children have been seriously injured or fatally injured in New Zealand and they always seem to be followed by a spokesperson for the sector being interviewed about what could have been done to prevent the tragedy. All too often the comment seems to be that we can't wrap kids in cotton wool and so there will always be accidents.

The HSE in Great Britain challenge this type of comment showing that exposing children to clearly identified unacceptable risk is not providing them with a life experience.

It is clear however that generally the country struggles with determining the boundary between safe activity that provides an opportunity to learn and grow, and unsafe activity that injuries and kills.

The community needs help in defining the boundary if the attitude to safety is to change. Heading out into the back country is an acceptable activity. Heading out without the right gear and without a map is unacceptable. Heading out with the right gear however does not mean that you won't get a life experience.

28. What might we do to improve our culture relating to workplace health and safety?

Changing the culture of the nation is going to be a formidable challenge but in forestry we attempt to change the culture of individuals once they arrive on our worksites. Short term we believe this is the solution. People will learn how to define where the safety boundaries are in the workplace setting, and can then apply the same process in their private life. For example in forestry you learn about having the right PPE to work in a hazardous environment and if you take this learning home, then you should wear hearing protection when you use noisy equipment, wear a life jacket when you go boating, think about the risks of working at height, etc.



## Other factors

29. Are there any other factors (not already covered) that influence workplace health and safety outcomes in New Zealand?

The forestry sector runs a drug and alcohol programme to detect (and rehabilitate) people who have taken drugs or consumed alcohol prior to attending work. These people are potentially impaired and pose a significant hazard to those in the same workplace.

There have been a number of high profile accidents recently where people in other sectors, adventure activities for example, have taken drugs prior to commencing work.

This suggests to forest owners that the drug taking problem in New Zealand workplaces is of such proportions that it needs addressed more firmly than is currently the case.

Those people in the forestry sector that do not wish to quit drugs are currently able to move to other sectors where there is no drug testing regime in place.

The forest owners believe that testing for drug use is an all practicable step that should now be mandatory for all high hazardous sectors and that such a requirement should be included in regulation.

30. Do you have any other suggestions for how to improve workplace health and safety outcomes in New Zealand?

The NZFOA is currently engaged in a number of initiatives to improve workplace safety. These are proactive injury prevention initiatives such as the safety culture work, and the breaking out certification programme.

The initiatives are joint ventures with ACC and MBIE. In the past ACC has put substantial funding into such work as part of the Safer Industries programme, but in recent times has indicated that a changing approach to safety on the part of the government, has meant restrictions to the funding available. The Safer Industries programme appears to have lost direction and momentum.

NZFOA acknowledge the changing environment but at the same time believe that commitments made to programmes that run over several years must be kept.

The NZFOA believe there would be value in an approach to safety where, for the high hazard sectors, a percentage of the injury cost for the year is put aside for injury prevention work, from the levy collected from the sector. The cost of injuries for the forestry sector currently sits at around \$11 million per year, and the NZFOA believe that it would be appropriate if 5% of that total, around \$500,000 was available for approved injury prevention initiatives.

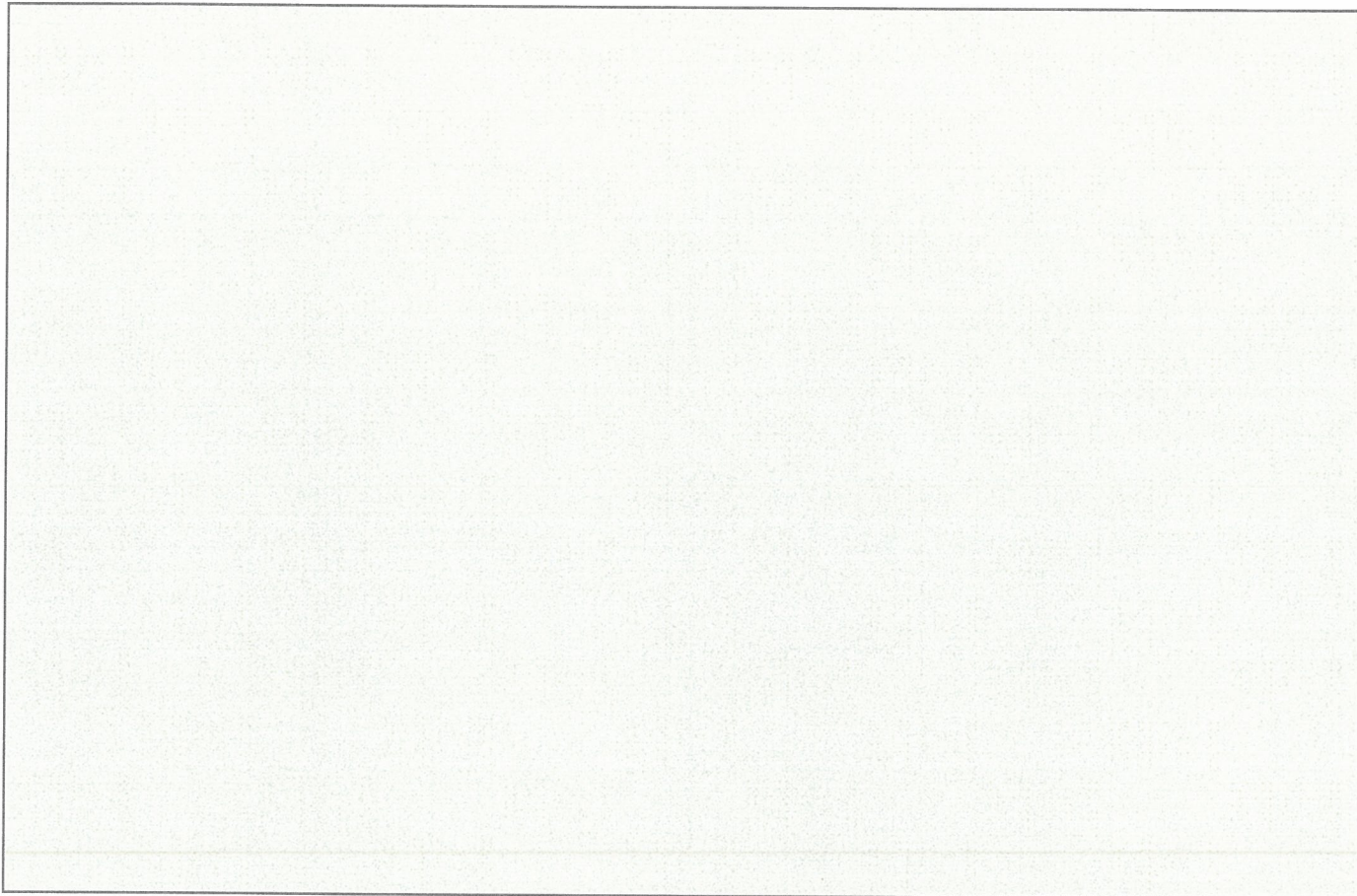
How this differs from the current approach is that at the moment ACC alone decides the injury prevention spend, but forest owners believe that there should be a requirement for input from each sector concerned, and that there should be a guaranteed amount of levy each year, that should be committed to injury prevention.



---

## Other comments

31. Are there any other comments that you would like to make?



Please send your completed submission to [secretariat@hstaskforce.govt.nz](mailto:secretariat@hstaskforce.govt.nz) (preferred) or post it to: Submissions, Independent Taskforce on Workplace Health and Safety, PO Box 3705, Wellington 6140. We would appreciate it if you could get your submission to us as early as possible, but at the latest, you must get your submission to us by **5pm, Friday 16 November 2012**. If you are sending your submission to us by mail, you should put it into the post by 5pm, Wednesday 14 November 2012.