ASSE STATEMENT ON U.S. CHEMICAL SAFETY BOARD MEETING

Safety professionals support OSHA’s need to advance safety standards for workplace chemical use

This statement is attributable to: Kathy A. Seabrook, CSP, CMIOSH, EurOSHM
ASSE President

“The American Society of Safety Engineers (ASSE) appreciates the leadership demonstrated by the U.S. Chemical Safety Board (CSB) in holding a public meeting July 25, 2013, to bring attention to the need for the Occupational Safety and Health Administration (OSHA) to advance standards that can help ensure all employers take responsibility for managing the risks of explosions in the workplace. This meeting not only is an opportunity for the occupational safety and health community to come together and discuss needed changes in standards. It also should help remind us of our shared responsibility to provide employers, workers, safety and health professionals, and emergency responders with the necessary tools for helping manage the risk of workplace explosions, whether or not OSHA is able to advance these standards.

“Realistically, any call to advance OSHA standards must take into account that the key obstacle to improving those standards is not necessarily OSHA’s. Our nation’s process for adopting or even improving workplace safety and health standards is broken and in dire need of a significant overhaul. As a community, we must join in finding a way to give OSHA the ability to move effective standards forward in a reasonable way.

“ASSE has included several suggestions to improve OSHA’s standard development abilities in our Draft Occupational Safety and Health Reform Bill. Encouraging cooperative rulemaking, ensuring OSHA relies on consensus guidelines when promulgating new rules, freeing OSHA to update referenced voluntary consensus standards are just a few ways the process can be fixed. ASSE is open to other ideas and hopes this public meeting will be a catalyst for discussion on how best to support a more functional OSHA standards-setting process.

“ASSE also appreciates CSB’s plan to use this meeting to identify a ‘Most Wanted Safety Improvement.’ While ASSE considers an appropriate combustible dust standard vitally important, the safety improvement we believe has the widest positive impact on the overall management of workplace safety and health risks is a truly risk-based OSHA injury and illness prevention program (I2P2) standard. An effectively written I2P2 standard has the potential of changing the very foundation of our nation’s approach to regulating workplace safety and health by moving employer focus from simply meeting prescriptive standards to taking active responsibility for identifying risks in each workplace and then establishing a plan to address each risk. An appropriate I2P2 standard would give every employer the opportunity to manage safety in the same way our safest, most successful employers and safety and health professionals achieve safe and healthy workplaces. ASSE encourages CSB to consider the I2P2 standard as the “Most Wanted Safety Improvement.”

“ASSE thanks CSB for its leadership and hopes our comments can expand the discussion to efforts that, if achieved, can help meet CSB’s goal of more effective oversight of workplace safety and health from OSHA.”

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For more information, please contact: Charlotte Norgaard, 847-768-3404, cnorgaard@asse.org