Consultation on Hazardous Substances Safe Work Instruments Response Form

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| Responses close:  **5 pm on Friday 8 September 2017**  Email to:  [Regulatory.Frameworks@worksafe.govt.nz](mailto:Regulatory.Frameworks@worksafe.govt.nz)  OR send by post to:  Consultation on Hazardous Substances Safe Work Instruments,  WorkSafe New Zealand  PO Box 165, WELLINGTON 6140  Attention: Regulatory Frameworks  Please put **Consultation on Hazardous Substances Safe Work Instruments** in the subject line |

## Submission on: Health and Safety at Work (Hazardous Substances­­- Thermoplastic stationary tanks) Safe Work Instrument 2017

Please use this response form to record your feedback.

If you are mailing your submission please add your contact details in the space provided. If you are emailing back this document, please add an email signature or similar with your contact information.

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| Name of responder (or contact for joint response): |  |
| Organisation name (and position if on behalf of an organisation): |  |
| Postal address: |  |
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|  |  |
| Telephone number: |  |
| Email: |  |
| Do you currently use **HSNOCOP** **56 Design and Construction of Thermoplastic Tanks for Class 6, 8 and 9 Hazardous Liquids** to help ensure you are compliant under the HSNO regime? |  |
| Do you currently use **HSNOCOP 4 Thermoplastic Stationary Tanks and Process Containers for Hazardous Liquids with Class 5, 6, 8 and 9 Hazard Classifications** to help ensure you are compliant under the HSNO regime? |  |

I wish to keep my contact details confidential

WorkSafe New Zealand will manage any personal information you supply in accordance with the Privacy Act 1993. If your response is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above.

WorkSafe New Zealand may post your response on its website: [www.worksafe.govt.nz](http://www.worksafe.govt.nz)  
We may make your response available if answering a request under the Official Information Act 1982.

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| **General comments** |
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| **Specific questions on the draft Health and Safety at Work (Hazardous Substances­­-Thermoplastic Stationary Tanks) Safe Work Instrument 2017** |
| Does the proposed safe work instrument incorporate existing requirements provided in HSNO COP 56 and HSNO COP 4 clearly for you to comply with? |
| Do you have any comment on the standards proposed to be incorporated by reference into the safe work instrument? |
| Do you believe specific training standards should be provided in this safe work instrument that welders are required to complete before being involved in the construction of tanks? If yes, please provide further information on why, as well as information on any specific training standards you would recommend. |

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| Alternativally, do you believe it is sufficient to require a welder to have relevant practical experience and knowledge in welding and for the person who engages the welder to be responsible to determine and to be satisfied that the welder has the relevant practical experience and knowledge? |
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| Clause 9 of the safe work instrument provides that during construction of a tank, a relevant PCBU must ensure a hydrostatic test is conducted for at least 48 hours (as informed by HSNOCOP 56). Do you agree with this timeframe? Or do you think this timeframe can be shortened e.g. to 8 hours? |
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| Do you think that Sodium Hypochlorite should be excluded from storage in tanks and therefore added to the list of substances provided in clause 12 (1)? Please explain your answer. |
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| If yes to the above question, can you propose what concentration amount for Sodium Hypochlorite should be provided? Please explain your answer. |