



NZ Manufacturers and Exporters Association
The independent voice of manufacturers and exporters

31 March 2009

Philippa Gibson
Department of Labour
Workplace Services
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Auckalnd

Email: philippa.gibson@dol.govt.nz

Dear Philippa

Submission on Intended Changes to Workplace Exposure Standards

Background

The New Zealand Manufacturers and Exporters Association (NZMEA) represents the interests of manufacturers and exporters throughout New Zealand.

The Association is New Zealand's only focused, independent voice for manufacturers and exporters, with members making over \$2.0 billion in sales, with an export value of around \$1.0 billion. The Association can trace its beginning to the early history of New Zealand. The Association represent the interests of manufacturers and exporters throughout New Zealand.

The Association also includes in its membership affiliates organisations such as the Wood Processors Association, Plastics New Zealand, the Engineering Printing & Manufacturing Union Inc, HERA (Heavy Engineering Research Association), The Engineering Taranaki Consortium and Capenz (Centre of Applied Engineering New Zealand).

The NZMEA is independent; we do not seek or receive funding from local or central government. We are not associated to any other business group.

Comments

The Association supports the comments made in papers presented by the Wood Processors Association (WPA) and A W Fraser Limited.

Particular concern has been expressed on the costs of compliance to any changes to the exposure standards, which has the potential to impact on companies possibly resulting in closures and job losses, given the current economic climate. Many in the furniture sector are struggling and to expect them to further upgrade their fluming systems when they are competing against not only imported products, but a downturn in consumer spending will see similar results.

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The WPA submission, and other comments on wood dust we have from manufacturers, suggests that changes from guidance to mandatory to lower levels of exposure are not supported by international best practice, or subject to HSNO legislation.

Exposure in the workplace is a fact, exposure at home and elsewhere in the environment is also a fact. If exposure levels are indiscriminately low, exposure in one place will, inevitably, cross over to others. This is a clear part of the AW Fraser submission. Lowering exposure to unrealistic levels will price process and activities out of whatever jurisdiction chooses to implement those levels. The lower the levels, the more difficult casual relationships are to establish; the more difficult and impractical become the required workplace conditions; the more difficult becomes the monitoring process – it is easier not to bother.

Any changes to workplace exposure standards must be subject to a cost benefit analysis and some common sense relating to best practice, not the impractical, of well intentioned, wish lists of those not subject to the economic reality of competitive markets. New Zealand exporters simply cannot compete if required to comply with standards absent to their international competitors.

Yours sincerely

A handwritten signature in blue ink that reads "John Walley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

John Walley
Chief Executive