



Envirocom (NZ) Limited

Health and Safety Policy Manual

Introduction: PCBU

Company number: 1242145
NZBN: 9429036316281
Incorporation Date: 30 Oct 2002
Company Status: Registered
Entity type: NZ Limited Company
Constitution filed: No
AR filing month: May , last filed on [03 Jun 2018](#)
[Annual return extract](#)

Ultimate holding company No

[Company addresses:](#)

Registered Office
29 Fortune Street, Dalmore, Dunedin, 9010 ,
New Zealand
Address for service
Unit 2.1, 8 Stafford Street, Dunedin, 9016 ,
New Zealand

Additional NZBN Information

Trading Name(s): Envirocom (NZ) Ltd
Phone Number(s): +64 3 4775966
Email: info@envirocom.co.nz
Address(es):
Website(s): www.envirocom.co.nz
Industry Classification(s): M696220 Environmental consultancy service – excluding laboratory service

[View all NZBN details](#)

Directors: Officers of the Company

Full legal name: Glenda Adele ALEXANDER
Residential Address: 29 Fortune Street, Dalmore, Dunedin, 9010 , New Zealand
Appointment Date: 30 Oct 2002
Consent: [Link to Consent Form](#)

Full legal name: Rex ALEXANDER
Residential Address: 29 Fortune Street, Dalmore, Dunedin, 9010 , New Zealand
Appointment Date: 30 Oct 2002
Consent: [Link to Consent Form](#)

Full legal name: Kirstine Adele MCANALLY
Residential Address: 188 Pine Hill Road, Dalmore, Dunedin, 9010 , New Zealand
Appointment Date: 10 Jul 2015
Shareholder: [Yes](#)
Consent: [View Consent Form](#)

Workers: Rex Alexander MPP Em Mgt. M.I. Fire E Technical Director
Brehagn Jane Alexander Administration
KM Compliance and Compliance Certification Ltd as subcontractors as required

Envirocom (NZ) Ltd
Environmental Compliance Management and Training
P O Box 5235, Dunedin 9058. Cell 0210460554
Email – Rex.Alexander@envirocom.co.nz

Definitions:

'PCBU'

17 Meaning of PCBU

- (1) In this Act, unless the context otherwise requires, a **person conducting a business or undertaking** or PCBU—
- (a) means a person conducting a business or undertaking—
 - (i) whether the person conducts a business or undertaking alone or with others; and
 - (ii) whether or not the business or undertaking is conducted for profit or gain; but
 - (b) does not include—
 - (i) a person to the extent that the person is employed or engaged solely as a worker in, or as an officer of, the business or undertaking;
 - (ii) a volunteer association;
 - (iii) an occupier of a home to the extent that the occupier employs or engages another person solely to do residential work;
 - (iv) a statutory officer to the extent that the officer is a worker in, or an officer of, the business or undertaking;
 - (v) a person, or class of persons, that is declared by regulations not to be a PCBU for the purposes of this Act or any provision of this Act.
- (2) In this section, **volunteer association** means a group of volunteers (whether incorporated or unincorporated) working together for 1 or more community purposes where none of the volunteers, whether alone or jointly with any other volunteers, employs any person to carry out work for the volunteer association.

'Officer'

18 Meaning of officer

In this Act, unless the context otherwise requires, **officer**, in relation to a PCBU,—

- (a) means, if the PCBU is—
 - (i) a company, any person occupying the position of a director of the company by whatever name called;
 - (ii) a partnership (other than a limited partnership), any partner;
 - (iii) a limited partnership, any general partner;
 - (iv) a body corporate or an unincorporated body, other than a company, partnership, or limited partnership, any person occupying a position in the body that is comparable with that of a director of a company; and
- (b) includes any other person occupying a position in relation to the business or undertaking that allows the person to exercise significant influence over the management of the business or undertaking (for example, a chief executive); but
- (c) does not include a Minister of the Crown acting in that capacity; and
- (d) to avoid doubt, does not include a person who merely advises or makes recommendations to a person referred to in paragraph (a) or (b).

'Worker'

19 Meaning of worker

- (1) In this Act, unless the context otherwise requires, a **worker** means an individual who carries out work in any capacity for a PCBU, including work as—
- (a) an employee; or
 - (b) a contractor or subcontractor; or
 - (c) an employee of a contractor or subcontractor; or
 - (d) an employee of a labour hire company who has been assigned to work in the business or undertaking; or
 - (e) an outworker (including a homemaker); or
 - (f) an apprentice or a trainee; or
 - (g) a person gaining work experience or undertaking a work trial; or
 - (h) a volunteer worker; or
 - (i) a person of a prescribed class.

'Duty of Care'

36 Primary duty of care

- (1) A PCBU must ensure, so far as is reasonably practicable, the health and safety of—
- (a) workers who work for the PCBU, while the workers are at work in the business or undertaking; and
 - (b) workers whose activities in carrying out work are influenced or directed by the PCBU, while the workers are carrying out the work.
- (2) A PCBU must ensure, so far as is reasonably practicable, that the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking.
- (3) Without limiting subsection (1) or (2), a PCBU must ensure, so far as is reasonably practicable,—
- (a) the provision and maintenance of a work environment that is without risks to health and safety; and
 - (b) the provision and maintenance of safe plant and structures; and
 - (c) the provision and maintenance of safe systems of work; and
 - (d) the safe use, handling, and storage of plant, substances, and structures; and
 - (e) the provision of adequate facilities for the welfare at work of workers in carrying out work for the business or undertaking, including ensuring access to those facilities; and
 - (f) the provision of any information, training, instruction, or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking; and
 - (g) that the health of workers and the conditions at the workplace are monitored for the purpose of preventing injury or illness of workers arising from the conduct of the business or undertaking.

‘Reasonably Practicable’

22 Meaning of reasonably practicable

In this Act, unless the context otherwise requires, **reasonably practicable**, in relation to a duty of a PCBU set out in subpart 2 of Part 2, means that which is, or was, at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters, including—

- (a) the likelihood of the hazard or the risk concerned occurring; and
- (b) the degree of harm that might result from the hazard or risk; and
- (c) what the person concerned knows, or ought reasonably to know, about—
 - (i) the hazard or risk; and
 - (ii) ways of eliminating or minimising the risk; and
- (d) the availability and suitability of ways to eliminate or minimise the risk; and
- (e) after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

‘Hierarchy of Controls’

- Health and Safety at Work (General Risk and Workplace Management) Regulations 2016
- Reg 5: Duty to identify risk
- Reg 6: If elimination of risk is not possible
 - Substitute
 - Isolate
 - Implement engineering or admin controls
 - Last resort – PPE

‘Notifiable Event’

A PCBU must ensure the regulator is notified as soon as possible after becoming aware that a notifiable event arising out of the conduct of the business or undertaking has occurred.

This allows the regulator to immediately investigate or follow up on events that cause death, serious injury or illness, or have the potential to cause death or serious injury or illness (serious health and safety risks).

The events that need to be Notified to WorkSafe New Zealand are identified in the attached document and at: <https://worksafe.govt.nz/notifications/notifiable-event/what-is-a-notifiable-event/#lf-doc-42300>

And include: any of the following events that arise from work:

- a death
- a notifiable illness or injury or
- a notifiable incident.

The notifiable incident, illness, injury or death must arise out of the conduct of the business or undertaking. It could be due to the condition of the work site, the way the work activity is organised, or the way equipment or substances are used. Notifiable events may occur inside or outside the actual work site.

Risk Management Principles applied by and advocated by Envirocom (NZ) Ltd:

This is the business we are in – managing the actual or potential effects of the import, manufacture, use, use in manufacturing, handling, storage and transportation of hazardous substances across all hazardous substance classes and all lifecycle phases for the protection of all persons who could be potentially adversely affected, and for the protection of the 'built' and natural environment.

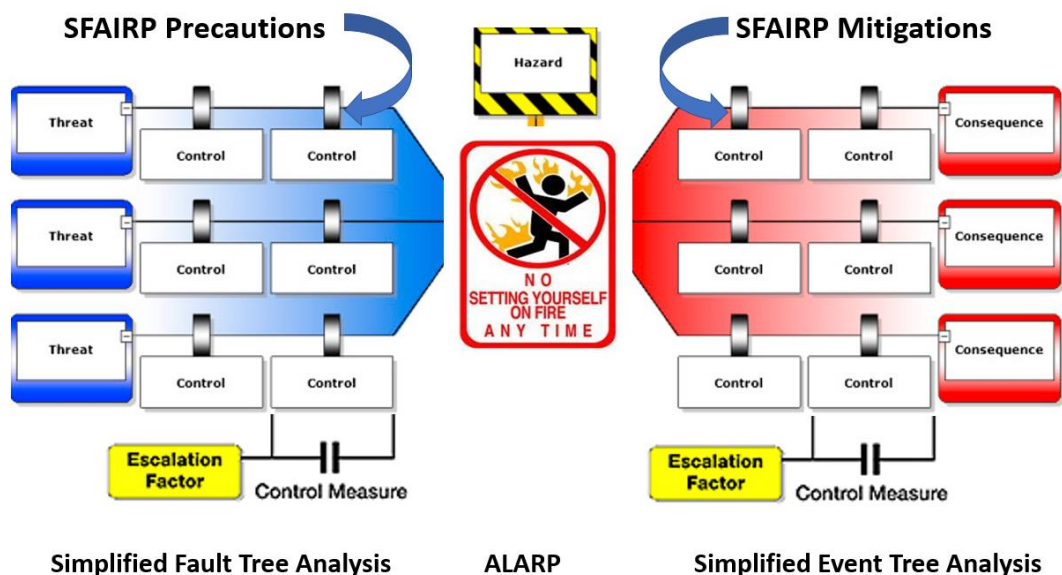
By; applying the principles of reducing risk So Far As Is Reasonably Practicable (SFAIRP) the legal test required by Regulation 6 of the Health and Safety at Work (General Risk and Workplace Management) Regulations 2016

SFAIRP vs ALARP

- **So Far As Is Reasonably Practicable (SFAIRP) – the legal test**
- **Precaution focused**
- H&S@W General Risk & Workplace Mgt: Reg 6(3)
- Hierarchy of Controls – Eliminate or Minimise
- Implement Precautions and mitigations unless unreasonable to do so

- **As Low As is Reasonably Practicable (ALARP)**
- **Hazard focused**
- Likelihood vs Consequence
- Calculate / Determine / Through Statistical Analysis / Compare; against
- Acceptable or Tolerable Risk Criteria

And; using holistic risk assessment methodologies ranging from Job Safety Analysis / Safe Work Method Statements (SWMS), Site Specific Safety Plans (SSSP-Site Safe) to Bow Tie Analysis:



Regulations, Safe Work Instruments (SWI) Guidelines and Codes of Practice

Regulations relevant to the consultancy, site assessment work and expert evidence services provided by Envirocom (NZ) Ltd include but are not limited to:

- Health and Safety at Work Act 2015
http://www.legislation.govt.nz/act/public/2015/0070/latest/DLM5976660.html?search=ts_act%40bill%40regulation%40deemedreg_health+and+safety_resel_25_a&p=1
- The Health and Safety at Work (Hazardous Substances) Regulations 2017
<http://www.legislation.govt.nz/regulation/public/2017/0131/latest/DLM7309401.html?src=qs>
 - Safe Work Instruments that impose or modify requirements Ref: Reg 11; & prescribe Exposure Standards Ref: Reg 12 with specific SWI listed at: <https://worksafe.govt.nz/laws-and-regulations/safe-work-instruments/hazardous-substances/>
- Health and Safety at Work (General Risk and Workplace Management) Regulations 2016
http://www.legislation.govt.nz/regulation/public/2016/0013/latest/DLM6727530.html?search=ts_act%40bill%40regulation%40deemedreg_health+and+safety_resel_25_a&p=1
- The Hazardous Substances and New Organisms (HSNO) Act 1996
<http://www.legislation.govt.nz/act/public/1996/0030/latest/DLM381222.html?src=qs>
 - Environmental Protection Authority (EPA) hazardous substance approvals and Group Standards
 - (EPA) Approved (Hazardous Substances) Notices 2017 – legally enforceable documents at: <https://www.epa.govt.nz/industry-areas/hazardous-substances/rules-for-hazardous-substances/epa-notices-for-hazardous-substances/>
 - (EPA) Approved HSNO Codes of Practice (HSNOCOP) – Guidance under HSWA
- The Resource Management Act 1991
<http://www.legislation.govt.nz/act/public/1991/0069/latest/DLM230265.html?src=qs>
 - Territorial Local Authority District Plans and Regional Authority Regional Plans
- The Building Act 2004 and related documents
<http://www.legislation.govt.nz/act/public/2004/0072/latest/DLM306036.html?src=qs>
 - Compliance Document for NZ Building Code F3 Hazardous Substances and Processes
- Fire and Emergency New Zealand Act 2017
<http://www.legislation.govt.nz/act/public/2017/0017/latest/DLM6712701.html?src=qs>
- Fire and Emergency New Zealand (Fire Safety, Evacuation Procedures, and Evacuation Schemes) Regulations 2018
<http://www.legislation.govt.nz/regulation/public/2018/0096/latest/LMS46332.html?src=qs>
- Land Transport Rule 45001 / 2005 Consolidated as at 1st October 2016 at: <https://www.nzta.govt.nz/assets/resources/rules/docs/dangerous-goods-2005-as-at-1-october-2016.pdf>

Policy Statement:

As the Technical Director, CEO, and as an Officer of the PCBU Envirocom (NZ) Limited, I affirm the Company is committed to ensuring the health and safety of all persons who might be or could potentially be impacted by the work carried out by the company.

Consistent with this Envirocom (NZ) Limited; its Officers and Workers will;

Comply with all legislative instruments applicable to the work of the PCBU.

Identify risks from hazardous substances that could or could likely adversely impact on any person, or on the built environment, or on the natural environment.

Identify all reasonably foreseeable emergencies that may arise from a breach or failure of the controls on any hazardous substance present or likely to be present at the workplace identified in an assessment of a client site.

Identify risks from other causes that are known or ought reasonably to be known to the PCBU as a result of qualifications held or experience gained in the execution of the duties of the Officers or Workers of the Company; that could or could likely adversely impact on any person, or on the built environment, or on the natural environment.

Advise all identified persons of the risks so identified and the protections that may be taken by those persons to ensure their safety or the protection of the environment.

Ensure all persons employed by the PCBU are actively managing their health and safety obligations including the wearing of PPE as directed by the Company or as directed by the client.

Engage in Continuing Professional Development (CPD) in all matters related to Health and Safety and the work of the PCBU in promoting safe management of hazardous substances.

Engage in a program of continuous improvement, including regular reviews of policy (including this policy) and documented consultancy advice to clients

Ensure reporting of all incidents, accidents, and identified medical events as required by WorkSafe New Zealand, including the recording of all near miss incidents that had they eventuated could have led to a notifiable event.

Undertake a full investigation of the events described above with the intent of improving future work practices of the PCBU or clients of the PCBU.

Where appropriate promulgate those findings through suitable media including the company website for the benefit of others.

Work undertaken on client sites:

Envirocom (NZ) Limited Workers will:

In the first instance present themselves to reception suitably dressed and with all PPE available.

Undertake and actively participate in client safety inductions, JSA's and SSSP's, advising and discussing (because that is our business) any perceived or identified shortfalls in the information provided by the client while making suggestions for improvement.

Comply with all health and safety instructions provided by the client unless identified that the instruction is non-compliant with the law.

At all times Envirocom (NZ) Limited Workers will be accompanied by suitably experienced senior staff of the client company in order to convey verbally, with later confirmation in writing; the safety and compliance issues noted during the site inspection.

Workers of Envirocom (NZ) Limited will not undertake Work at Heights or Work in Confined Spaces on a client site and will not operate any vehicles or machinery other than e.g. publicly accessible lifts.

The driving of motor vehicles on a client's site is discouraged and will only be engaged in under circumstances approved by all parties.

Comprehensive first aid kits and fire extinguishers are kept readily accessible in Envirocom (NZ) Limited vehicles with Workers highly experienced in their use.

Vehicles are regularly maintained, registered, warranted and kept in roadworthy condition.

Compliance with the law and safe driving practices in company or rental vehicles shall be maintained at all times on company business. Rest breaks will be taken as appropriate.

The use of cameras and iPads are a normal part of our site audit work practices and will be used with client permission only and then only outside any Hazardous Area Electrical Zone not suited to the electrical device.

Photographs taken will be used only for the purpose of reporting and other than as may be required by law will not be disclosed to any other party without express permission.

The use of cell-phones is identified as a risk and will only be used in client permitted locations

It is expected that Envirocom (NZ) Limited Workers will conduct themselves in a professional and ethical manner at all times. No alcohol will be consumed in the workplace other than as permitted in a suitable venue and consistent with safe driving requirements.

Envirocom (NZ) Limited operates a strict no smoking policy at all times and in all locations.

Documentation available or attached as appendices:

Current evidence of insurance cover

This Health and Safety Policy

Evidence of qualifications, CPD and training records including CV's

The documents: 'Some thoughts on Emergency Planning' – hazardous substances

Site Specific Safety Plan (SSSP) example provided by SiteSafe in the absence of any provided by the client

Risk Register

Incident Register

Injury / Illness Investigation form

As at 01/01/2020

From the date of the company incorporation 30/10/2002 there have been:

- No lost time injuries
- No illnesses attributable to the working environment resulting in lost time

The work of Envirocom (NZ) Ltd for clients or any other person has resulted in

- No lost time injuries attributable to any actions or lack of action by Envirocom (NZ) Ltd staff
- No illnesses resulting in lost time attributable to any actions or lack of action by Envirocom (NZ) Ltd staff

Signed for an on behalf of Envirocom (NZ) Limited

R Alexander:

Date:

Position
Director