

ISO SAFETY STANDARD COMING?

What is the new ISO safety and health management standard you mention in your upcoming ASSE session?

I thought we'd be further along than we are in developing an ISO safety and health management standard, but still I think it's inevitable. It's like certain inventions, like the combustion engine, it's coming, it's inevitable.

Right now ISO is still awaiting an official proposal from BSI (a British organization promoting OHSAS 18001). And we are also awaiting the outcome of ongoing talks between ISO and the International Labor Organization (ILO). ILO has already developed its own safety and health management system guidelines.

Probably one-half of the ISO players say a safety and health management standard is needed, and the other half doesn't know for certain. But now you have a number of standards out there - ANSI Z10, 18001, the ILO guidelines - and at some point people will say, "Let's just focus on one." Plus, some emerging nations like China would love to have an ISO safety and health management standard to use because they don't have national safety and health systems standards. So ISO solves their problem of getting companies to act responsibly on their soil.

Today we operate in a truly international market, and it's naïve to say there is no need for any international safety and health management standard. The market will push demand for this standard.

SYSTEM STANDARDS THE SAME?

18001, Z10, ILO - some safety people claim all management system standards are basically the same. Do you agree?

Yes. If you put side by side ISO 9000, ISO 14000, OHSAS 18001 (which is often mistaken for an ISO standard but it is not) and ANSI Z10 you'll see little difference. There's no question if you're jumping through the management system hoops for ILO, 18001 or Z10, they are the same hoops basically. They all hold to the same basic concept: assess your risks, plan what you need to do to reduce those risks, do it, and then check up on what you did to see if it worked, or you need more tweaking.

With little modification, for example, I could take the ISO 14000 environmental management standard, insert safety and health provisions, and turn it into a one-stop shopping EHS management standard.

FOR BIG BOYS ONLY?

Some safety pros have the perception that safety and health management systems are only for the big boys, the large corporations. Do you agree?

When we were drafting the ANSI Z10 standard there was the concern expressed that we are standardizing the small business guy into a corner. With all the regulations, permits and so on, there was the concern that ANSI Z10 would be one more nail in the coffin preventing the small business guy from keeping up and staying competitive.

The Z10 standard was written very carefully so the small business guy doesn't get slapped down. You can pick up the Z10 standard, which sets the bar for modern safety and health management systems, and implement it in a small business or in ExxonMobil.

You start with the classic PDCA cycle - plan, do, check, act. You plan; you look at the risks in your business. Then you decide what to do to control them. You put the control pieces in place and then check - is this working? You take further action if you need to tweak your control systems.

You don't need to be buried in paperwork to do this. You don't need a staff of thousands. You can do this whether you have 20 employees or 2,000 employees. You can do this yourself.

DOCUMENTED BENEFITS?

Have the benefits of safety and health management systems been validated by research? Is there any kind of documented evidence that these management systems lower injury rates, improve OSHA compliance, improve productivity or quality or other business metrics?

Like many aspects of safety work, the benefits are hidden. In a way, it's the things that don't happen. But any business definitely benefits by focusing on the risks in the business. The pay-off is enormous.

I'm not just talking about safety and health risks, but your company's broader liabilities, such as public access risks. The benefits are very difficult to measure. It's not like you lose \$100,000 one year and \$20,000 the next. It's hard to demonstrate.

CAN OSHA ENFORCE THE Z10 STANDARD?

Discuss the potential for OSHA to use the new ANSI Z10 standard requirements to cite companies for general safety program deficiencies under the General Duty Clause of the Occupational Health and Safety Act.

This was a question that came up more than once as we developed the Z10 standard: Are we, in effect, creating the safety and health program standard that OSHA does not have, and will our standard be cited by OSHA? The legal opinions we received said that OSHA cannot simply adopt the Z10 standard under the General Duty Clause 5A1. OSHA can't pick at will a standard to cite against. It must go through rulemaking to adopt something like Z10 as a reference standard.

Now in a large settlement case, OSHA might say to a company: put in a system safety program like Z10. But that would be part of settlement negotiations, not enforcement.