



British Rubber & Polyurethane  
Products Association

## BRPPA HEALTH, SAFETY AND ENVIRONMENTAL FUNCTIONS

### Our Mission

“To provide our members in the rubber and polyurethane manufacturing industries the expertise required for responsible management of health, safety and environment in order to compete successfully in the global market”

### Management of Health Safety & Environment

Over the years businesses have come under ever increasing pressure from EU and UK health, safety and environment (H,S&E) legislation. The effective management of health, safety and environment aspects is key to ensuring the continued viability and reputation of companies. The cost of accidents and ill-health in the workforce, compounded with enforcement actions by the Health and Safety Executive, Environment Agency and Local Authorities, can be detrimental to business growth. UK H,S&E legislation requires companies to ensure that persons appointed to manage HS&E aspects are competent and have the necessary experience and expertise to carry out their duties.

Given the pace of change in the legislation and the diversity of technical skills required in the effective management of H,S&E issues, very few organisations can afford to employ the necessary personnel to ensure legislative compliance. Furthermore, it has now become more crucial than ever for any business sector to successfully influence new legislation being formulated in European Directives in order to ensure that undue and burdensome proposals are dealt with in time.

In the absence of effective representation and lobbying at both the EU and UK level, the competitiveness of UK rubber industry can be significantly affected in the global market.

### BRPPA's Background in HSE

BRPPA (previously part of the British Rubber Manufacturers' Association - BRMA) established the Health Research Unit in Birmingham in 1957. The Unit had three main functions:

- to look at health problems in the rubber industry;
- to provide general advice on all matters relating to occupational health;
- to provide a urine screening programme for rubber workers who, up to 1949, might unknowingly have been exposed to bladder carcinogens.

In recent years the needs of members in relation to management of Health, Safety and Environment aspects of business have grown considerably. In response, BRPPA's H,S&E services have evolved, providing cost-effective solutions for the immediate and long-term business interests of members.

In brief, BRPPA's H,S&E services are focused on members' needs and our aim is to: *“provide our members in the rubber and polyurethane manufacturing industries the expertise required for responsible management of health, safety and environment in order to compete successfully in the global market.”*

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### BRPPA's Expertise in Health, Safety and Environment

BRPPA provides its member companies with extensive services on health, safety and environment (HS&E) issues by employing experts with previous hands-on experience of managing H,S&E in the private and public sectors and specialist knowledge of the industry. This body of HS&E expertise allows BRPPA to respond cost-effectively to the day-to-day needs of its members' concerns in managing HS&E.

In addition, BRPPA's HS&E experts play a proactive role in representing the interest of rubber and polyurethane products sectors in consultative industry forums in the UK and the EU. Identifying emerging issues, influencing legislative proposals and negotiating agreements that are likely to impact on the management of HS&E in these sectors are key areas of BRPPA's routine activity.

### BRPPA's Expertise

All health, safety and environment support is provided by the Health, Safety and Environment Director, Dr. Abid Dost. Abid's experience in HS&E as well as his wide network of contacts in HSE & EA mean that BRPPA members receive valuable advice and information not only on HS&E management but also in terms of assistance in dealing with enforcement issues, advice on litigation cases, accident investigations, etc.

Dr. Abid Dost - Prior to joining BTMA, Abid, a Physical Chemist by training (EurChem, CChem, FRSC, CMIOSH, CMFOH), worked in both the areas of occupational health and safety and environment. As a senior member of Health and Safety Executive's staff he obtained extensive experience of the rubber industry through his work with the National Rubber Industry Group. He is a Chartered member of the Institute of Occupational Safety and Health (CMIOSH). He has over 25 years experience in industrial occupational hygiene and he is a Chartered Member of the Faculty of Occupational Hygiene (CMFOH).

### Details of External Representation Role

BRPPA is represented by the Health, Safety and Environment Director, or other experts where more appropriate, on a number of external health and safety committees and working parties. Through BRPPA's presence on these committees, many of which are involved in formulating national and European health and safety legislation, the views of the membership can be made known directly to the legislators and timely action can be taken to prevent any future adverse impact on the rubber industry.



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### Tyre and Rubber Industry Safety Action Group (previously RUBIAC)

This is a tripartite committee made up of employers and employees representatives together with HSE inspectors, who currently chair the meetings. The steering committee sets priorities on all aspects of health and safety work specifically related to the tyre and general rubber goods industry. Through its Working Groups (WG1 tyre and rubber Manufacturing and WG2 on tyre related post production issues) the steering committee directs and monitors the work, and the BRPPA representatives provide a very direct and significant input to influencing health and safety policy and operational issues at the most senior levels within the rubber and polyurethane industries. [The terms of Reference for TRISAG are attached here.](#)

BRPPA has a rolling Health and Safety Action Plan, the current one being the [2014-16 Action Plan, attached](#). It provides TRISAG with annual reports on the progress of its Action Plan. [The report for 2011-13 is being collated and that of 2007-2010 is attached here.](#)

### BRPPA Polyurethane Elastomer Group (PEG)

PEG's objective is to promote and represent the interests of the polyurethane elastomer industry in the UK involved in the manufacture and supply of polyurethane elastomeric products. Its primary functions are:

- (a) To act as a forum for the exchange of views on matters of interest to the Polyurethane Elastomer Industry;
- (b) To identify areas of concern to the polyurethane elastomer industry and to determine the strategy required to overcome those concerns; and
- (c) To liaise, via BRPPA, with UK Government, especially the Health & Safety Executive, the Department for Business, Innovation and Skills (BIS) and the Department for Environment, Food and Rural Affairs (DEFRA) on relevant matters.

Further details about the Terms of Reference for PEG are attached here. PEG's most recent publication relates to the guidance on safe use of MbOCA, [see attached the Safe Use of MbOCA Leaflet](#).

### BRPPA Rubber Group

Its objective is to promote the interests of the rubber manufacturing sector, from custom compounding to the manufacturing of finished rubber articles. Its primary functions are:

- (a) To act as a forum for the exchange of views on matters of interest to the rubber manufacturing industry;
- (b) To identify areas of concern to the rubber manufacturing industry and to determine the strategy required to overcome those concerns; and
- (c) To liaise with UK Government, especially the Health & Safety Executive and the Department of the Environment, Food and Rural Affairs (DEFRA), on relevant matters.

Further details about the Terms of Reference for the Rubber Group are attached here. As examples of its activities, the rubber group has organised workshops on REACH thereby providing guidance and information to members,

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organised workshops on health and safety management for supervisors and managers, as well as joint-workshop with the HSE for maintenance engineers on the issues involved in risks assessments on the shop floor. The Rubber Group liaises closely with HSE inspectors to improve H&S matters and an example of this was the modification of the HSE guidance note on safety measures relating to rubber calenders. Due to technical difficulties in implementing existing HSE guidance as pointed out by BRPPA, HSE guidance was revised. Another example of its diverse range of activities is its recent work in which BRPPA participated in a project, using EU research funds, which undertook research and development work into a safer alternative replacement for thiourea based accelerators in the production process of chloroprene rubber. It was launched in mid-2010 and is ended in 2013. The project was initiated by a group of associations in the European area (including BRPPA) representing a range of SME rubber manufacturers, and working with a number of other partners through a consortium. More details can be found on the project website: [www.saferubber.eu](http://www.saferubber.eu).

### Advice & Assistance

Advice is available on all matters relating to health, safety, the environment and occupational hygiene on a daily basis. Members' queries are usually dealt with by telephone, fax or e-mail but, where necessary, arrangements are made for visits to the factory. The site visits provide members with high added value input to their HS&E management in general, as well as in dealing with specific issues of concern such as HSE enforcement notices.

### Site Visits

The site visits may be concerned with particular health and safety problems, such as dermatitis, repetitive strain injury, manual handling, risk assessments, COSHH compliance, noise assessments, accident prevention, authorisations under the Environmental Protection Regulations or on occasions to speak to union representatives about particular concerns which they may have on health matters. BRPPA is also very much involved in advising members on industrial injury compensation claims and has in-depth expertise in matters relating to bladder cancer claims.

### Regulatory Risk Assessments

BRPPA is proactive in dealing with regulatory matters such as the re-classification of rubber chemicals or new limit setting initiatives for these materials. BRPPA experts have in the past years been involved in risk assessments relating to carbon black, toluene, aromatic oils, crystalline silica, PAHs, MbOCA and isocyanates. BRPPA has organized together with HSE Inspectors numerous exposure monitoring exercises for rubber and polyurethane workers in order to better understand and improve the working conditions and controls employed in reducing exposures of workers.

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### Newsletters

Where matters of particular importance are concerned, information is disseminated via BRPPA Newsletters. Members are kept up to date on emerging legislation and relevant matters by an ongoing series of Health, Safety and Environment News via the BRPPA Newsletters.

### Seminars and Workshops

Briefing Seminars are also held to keep the members aware of new and proposed developments so that they are prepared for any new regulatory proposals well in advance of their implementation. Seminars held in the past have included topics such as the Environmental Protection Regulations, VDUs, manual handling, management of occupational health, role of supervisors in management of health and safety, role of senior managers in management of health and safety, maintenance Engineers' workshops to promote improved risk assessments for maintenance work, improving understanding of REACH Regulations for the rubber industry, etc.

### BRMA Health Research Project

Following the discovery in the 1940s of a risk to rubber workers developing bladder tumours, the then BRMA asked the Institute of Occupational Health at Birmingham University to carry out an epidemiological study looking at the causes of death among rubber workers. Since then the study has looked at some 38,000 rubber workers employed by BRMA members in the industry between 1946 and 1960 and has followed up their health experience for over fifty years. This is almost certainly the largest study of any industry group carried out anywhere in the world.

The results showed not only that the bladder cancer problem had been eliminated but it also provided a great deal more helpful information about the health of rubber workers. It is important for the rubber industry to be able to demonstrate this clearly and to this end the new study involves over 10,000 current day rubber workers from over forty factories.

The preliminary findings are extremely encouraging and will increase in significance as time goes on and more results become available as the working population gets older. The first analysis of the findings of this study have recently been published and confirm the encouraging findings of the HSE study. The Rubber Industry Advisory Committee (RUBIAC), the predecessor to TRISAG, issued a cancer risk statement for rubber workers based on the latest findings from the latest BRMA Health Research Project.

### BRPPA Health Study of MbOCA Workers

BRPPA has been monitoring the health outcome of UK MbOCA workers in order to better understand the risks associated with users of MbOCA. It published the findings of the project in a peer review publication in 2009 (attached published paper) and this work was used by the Rubber Industry Advisory Committee (RUBIAC, the predecessor to TRISAG) to publish the statement on Occupational Cancer for MbOCA workers,



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### Cytology Screening

Following the old bladder cancer problems now known to have been associated with exposure to contaminated rubber compounding chemicals, BRPPA has been screening exposed workers for this condition since 1957. Although the contaminated materials were withdrawn from manufacture in 1949, because of the delay between exposure and the possibility of developing a bladder tumour, urine screening has to continue through the life of the individual.

Nearly 600,000 samples have been tested and this has resulted in many bladder tumours being diagnosed at a very early stage when medical intervention can be at its most effective.

### Major Publications

BRPPA's wide role and scope of activities gives it the authority to represent the industry to customers, the media, government, the EU and other international organisations.

Toxicity and Safe Handling of Rubber Chemicals: Code of Practice ref: Fourth Edition; Available from RAPRA  
[www.rapralimited.org](http://www.rapralimited.org)

- Foreword
- PART I General Information & Code of Practice
- PART II Control of Workplace Exposure, Bibliography, Initials and Acronyms
- PART III Information for individual Product Groups and Rubber Chemical Data Sheets
- Index of Rubber Chemical Suppliers
- Index of CAS Registry Numbers
- Index of EINECS Numbers
- General Index

Toxicity and Safe Handling of Di-isocyanates and Ancillary Chemicals: ref: Second Edition

- Section 1: Purpose, Regulations and Definitions
  - Section 2: Di-Isocyanates: Description, Handling and Storage
  - Section 3: Ancillary Chemicals
  - Section 4: Production Equipment and Processing Precautions
  - Section 5: Visitors to Isocyanates Areas
  - Section 6: Personnel and Welfare
  - Section 7: Occupational Health
  - Section 8: Code of Practice for the use of MbOCA in the Manufacture of Polyurethane Elastomers
  - Section 9: Control of Airborne Contamination
  - Section 10: Respirators
  - List of Abbreviations
  - Index
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### Other Scientific Publications

**2009: Abid Dost; J K Straughan; Tom Sorahan;** Cancer incidence and exposure to 4,4'-methylene-bis-ortho-chloroaniline (MbOCA). **Occupational medicine (Oxford, England) 2009;59(6):402-5.**

**2007: Abid Dost; J K Straughan; Tom Sorahan;** A cohort mortality and cancer incidence survey of recent entrants (1982-91) to the UK rubber industry: findings for 1983-2004. **Occupational medicine (Oxford, England) 2007;57(3):186-90.**

**2000: Abid Dost; Dave Redman; Geoff Cox;** Exposure to rubber fume and rubber process dust in the general rubber goods, tyre manufacturing and retread industries; *Ann OccupHyg* 2000; 44 (5): 329-342.

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