

Policy Hierarchy link	Work Health and Safety Act 2011 Work Health and Safety Regulation 2011 Work Health and Safety Policy		
Responsible Officer	Director, UNSW Safety and Sustainability		
Contact Officer	Manager, UNSW Health & Safety		
Superseded Documents	HS335 Prohibited and Restricted Carcinogens Procedure v1.5		
File Number	2016/00369		
Associated Documents	HS332 Hazardous Chemicals Procedure Applicants guide for authorisation to use, handle or store prohibited or restricted carcinogens List of Prohibited Carcinogenic Substances List of Restricted Carcinogenic Substances		
Version	Authorised by	Approval Date	Effective Date
1.6	Director, UNSW Safety and Sustainability	21 March 2016	21 March 2016

1.	Purpose and Scope.....	1
2.	Definitions.....	1
3.	Procedure.....	2
3.1	Investigate Alternatives	2
3.2	Notify WorkSafe NSW	2
3.3	Risk Management.....	2
3.4	Options by WorkSafe NSW	3
3.5	Order the Substance	3
3.6	Keep Records.....	3
3.7	Statement of Exposure for workers.....	4
3.8	Duration of Approval.....	4
3.9	Disposal.....	4
4.	Review & History	4
5.	Acknowledgements	4

1. Purpose and Scope

Strict controls are required on the purchasing of prohibited and restricted carcinogenic substances and such substances may not be kept or used at UNSW Australia without prior authorisation from WorkSafe NSW (Clause 384 WHS Regulation). This procedure applies to all research staff who are proposing to use prohibited or restricted carcinogens, and their supervisors.

2. Definitions

Prohibited carcinogen is any substance prohibited from use **unless** the substance is used for genuine research and analysis only AND prior authorization has been received from WorkSafe NSW. See list of such substances in 'Associated Documents' above.

Restricted carcinogen is one that requires WorkSafe NSW to be notified before the substances can be purchased and used. See list of such substances in 'Associated Documents' above.

Authorised Person The Principal Researcher; the name that will appear on the WorkSafe NSW approval form.

Genuine research: means systematic investigative or experimental activities that are carried out for either acquiring new knowledge (whether or not the knowledge will have a specific practical application) or creating new or improved materials, products, devices, processes or services. (Appendix 1: COP for Labelling).

3. Procedure

Follow the steps below.

3.1 Investigate Alternatives

- Minimise the acquisition and use of carcinogenic substances as far as reasonably practicable.
- Encourage researchers to actively investigate whether suitable alternative substances could be used to achieve similar outcomes.

3.2 Notify WorkSafe NSW

The principal investigator (or other similar senior position) must apply in writing to WorkSafe NSW for authorization to use, handle or store a prohibited or restricted substance. Prohibited carcinogens cannot be used for any purpose other than genuine research purposes.

The written application for notification to WorkSafe NSW must include the details of:

- Applicant's name and business address;
- Name and address of the supplier of the carcinogen;
- the address where the carcinogen will be stored, handled or used;
- the name of the carcinogen;
- the quantity to be stored, handled or used each year;
- the purpose and activity for which the carcinogen is required;
- the numbers of workers that may be exposed;
- why the substance can't be substituted with another less toxic substance;
- how risks will be controlled.

3.3 Risk Management

As with all work involving hazardous chemicals, a documented risk management form must be completed. This should include describing how the carcinogen is to be used and how exposure will be minimised. It should also detail decontamination and waste disposal measures.

In particular the management of exposure to inhalation risks should be detailed (e.g. exposure to aerosols and particles) wherever they are generated for example during:

- pipetting;
- sonication or open vessel centrifugation;
- opening of closed vessels;
- transfer operations;
- preparation of feed mixtures;
- grinding, blending, shaking, mixing;
- Injection or intubation of a chemical carcinogen into experimental animals.

Risk control measures need to be reviewed if:

- there are any changes made to the safety data sheet;
- worker has elevated levels (detected during health monitoring);
- worker experiences adverse health effects or recommendation for remedial action is made in a health monitoring report;
- risk is not controlled;
- there is a change in the workplace;
- new risks are identified and, at least every 5 years.

The usual systems for managing chemicals risk must be in place e.g.

- Containers containing carcinogens must be correctly labelled;

- Containers must be stored appropriately with access limited to authorised persons;
- Current, appropriate SDS available and readily accessible to workers;
- Carcinogen is included in the Hazardous Chemicals register (e.g. recorded in SciQuest ERM);
- Workers must be provided with appropriate instruction and training including training in the safe work procedure for the task;
- Risk controls particularly engineering controls must be inspected and tested;
- Procedures should be in place to deal with emergencies e.g. spills,

WorkSafe NSW may ask for this information to be submitted for their review before they grant their approval.

3.4 Options by WorkSafe NSW

On receipt of the application WorkSafe NSW may:

- Grant the authorization;
- Grant the authorization with conditions imposed;
- Refuse the application (the prohibited carcinogen may not be for genuine research work or the restricted substance may be used for a purpose other than that listed);
- Cancel the authorization if the authorization is not being complied with or if the risks to workers have changed since the original application.

Decisions made by WorkSafe NSW are reviewable and are outlined in clause 676 of the WHS Regulation.

3.5 Order the Substance

Prohibited and restricted carcinogenic substances can only be supplied to people with valid written acknowledgement from WorkSafe NSW. Once you have obtained the acknowledgement from WorkSafe NSW you will be asked to produce it as evidence when you proceed to order the substance.

3.6 Keep Records

The Head of School or Centre must ensure that the following records related to prohibited and restricted carcinogens are kept:

Type of Record	Duration
A copy of each authorization given to the authorised person (including conditions imposed if applicable)	30 years after the authorization ends
Full name, date of birth and address of each worker likely to be exposed to the prohibited or restricted carcinogen during the period of the authorisation	30 years after the authorization ends
Risk Assessments for work with prohibited and restricted carcinogens	30 years from the last activity
Any air monitoring or health surveillance record (if applicable)	30 years after the authorization

These records should be maintained in the staff personnel files in the HR department.

3.7 Statement of Exposure for workers

The authorised person must give a written statement to each relevant worker at the end of the worker's engagement on the project in which the carcinogen is used. This statement must:

- Name the prohibited or restricted carcinogen the worker may have been exposed to for the duration of the work;
- State the time the worker may have been exposed;
- Outline where and how the worker may obtain records of the possible exposure;
- State whether the worker should undertake regular health assessments and the relevant tests to undertake.

3.8 Duration of Approval

The authorization is of unlimited duration unless cancelled by WorkSafe NSW.
Ref: Applicants guide for authorisation to use, handle or store prohibited or restricted carcinogens

The authorised person is required to notify WorkSafe NSW of any change to the information supplied in the original application.

3.9 Disposal

Disposal can be organized in the usual manner as with all other chemical waste. If prohibited or restricted substances are found in laboratories and **no longer** required then arrangements should be made for their disposal. Alternatively, if such carcinogens are in existence and currently being used without WorkSafe NSW authorisation, then immediate approval must be obtained.

4. Review & History

This procedure will be reviewed in accordance with the HSMS Review procedure.

5. Acknowledgements

Appendix A: History

Version	Authorised by	Approval Date	Effective Date	Sections modified
0.1	Director, Human Resources	11 November 2006	1 November 2006	The requirements from Section 5.1 of Carcinogenic Substances Guideline have been extracted to exist as an individual procedure focussing on this sub group of carcinogens.
1.0	Director, Human Resources	1 January 2007	1 January 2007	No changes from consultation process
1.1	Director, Human Resources	10 March 2008	10 March 2008	Add section on disposal. Include expiry date. Include WorkSafe NSW reference.
1.2	Director, Human Resources	20 May 2008	20 May 2008	Change wording from Authority to Acknowledgement in Sections 1 and 4.2
1.3	Director, Human Resources	3 May 2011	3 May 2011	Reformatted to current University Procedures template
1.4	Director, Human	19 March 2013	19 March 2013	Updated in accordance with new legislation.

	Resources			'Notifiable' becomes restricted. Asbestos removed from prohibited list. New requirements to notify workers of exposure (section 3.6) Updated Branding Logo in accordance with UNSW Branding Guidelines. Modified the document identifier from OHS to HS in accordance with WHS legislation review
1.5	Director, UNSW Safety and Sustainability	30 April 2014	30 April 2014	Reviewed for administrative updates
1.6	Director, UNSW Safety and Sustainability	21 March 2016	21 March 2016	New section 3.3. on Risk Management. Capturing requirements from the hazardous chemicals procedure particularly pertaining to carcinogenic risks