

Short impact assessment

New web-based publication called ‘Protecting people’s health from isocyanate exposure in spray booths and spray rooms’.

<p>Description of the intervention:</p>	<p>This guidance is aimed at owners and managers of bodyshops and will be of use to employees particularly paint sprayers and suppliers.</p> <p>The guidance will supersede other HSE guidance relating to:</p> <ul style="list-style-type: none"> • Protecting people’s health from isocyanate exposure in spray booths and rooms; • The 14-monthly thorough examination and test carried out on spray booths and rooms.
<p>Objectives:</p>	<p>The objective of this guidance is to improve the control of exposure to isocyanate paint mist which can cause occupational asthma. A reduction in cases of occupational asthma is a priority for HSE within the Disease Reduction Programme.</p>
<p>Calculation of costs:</p>	<p>This guidance has been prepared by the MVR project team and a Working group of key stakeholders which includes motor vehicle associations and booth suppliers. The industry that the guidance relates to is the motor vehicle repair industry.(SIC 50200). According to HSE’s Epidemiology Medical and Statistics Unit (EMSU) the Labour Force Survey (LFS) data suggests that there are about 21,000 “vehicle spray painters” in the UK. The Institute of Occupational Medicine (IOM) study of isocyanate usage suggests that there are about 6200 MVR bodyshops in the UK. Allowing for some underestimation and including the existence of a significant number of ventilated spray rooms, an upper estimate of the number of MVR bodyshops in UK would be around 8,000.</p>

Impact on industry (including any effect on the admin burdens baseline)

The guidance seeks to improve good practice in bodyshops and make paint sprayers aware of the need to:

- use spray booths and rooms
- correctly use air fed breathing apparatus
- know the clearance time of their sprayroom or booth and
- apply correct working procedures

COSHH Requirements and the new Guidance

Under COSHH there is a requirement for employers to choose and apply the most effective and reliable control options which minimise the escape and spread of substances hazardous to health (in this case a booth or spray room) and also combine personal protective equipment like air fed masks where adequate control of exposure cannot be achieved by using LEV alone.

COSHH also requires employers to check and maintain control measures and also to keep records. There may be an additional administrative burden however on suppliers because the guidance recommends they develop a User Manual to guide their customers in operating and maintaining the booth or spray room.

1) Cost of developing and compiling user manual

Time cost of writing owners manual plus costs of filling in manual - again divided into two subcosts.

(1) Capital cost of book/paper = $8,000 \times 2 = \text{£}16,000$

(2) Time cost of writing manual = 2 hours, and daily/weekly/monthly/annual time costs of filling it in =

(i) daily cost = 1 mins

(ii) weekly cost = 1 mins

(iii) monthly cost = 3 mins

(iv) annual costs = 10 mins
Total annual costs = 120 + (350) + (50) + (12 x 3) + (1 x 10) = 9.5 hours = 9.5 x £30 = £285 x 8000 = £2.28 million.

Therefore total cost of writing and filling in user manual is a capital cost of £16,000 and an annual cost of £2.28 million

In this guidance there is a new requirement to know the clearance time of the spray room or booth which will necessitate the purchase of a smoke machine for less than £50.

For large commercial booths a smoke generator is required to run the test which costs £650. The guidance however doesn't advise purchase of the generator but suggests the company that conducts the annual thorough examination could be asked to do the test for the company.

2) The cost of measuring clearance can be calculated as follows:

(a) Cost of measuring clearance: divided into two sub-costs.

(1) Capital cost of smoke generators = Number of booths/rooms minus number already with a smoke generator. 8000 - 2000 (guess!) = 6000 x 50 = £300,000 (with a yearly maintenance/replacement cost of 10% = £30,000).

(2) Time cost of measuring as an annual cost = one hour x 6,000 x £30 (hourly cost) = £180,000

Therefore total cost of measuring clearance is a capital cost of £300,000 and an annual cost of £210,000.

COSTS IN TOTAL

**TOTAL CAPITAL COSTS = £316,000
TOTAL ANNUAL RUNNING COSTS = £2.49 MILLION**

TOTAL OVERALL COSTS = £2,806,000

Benefits (quantified where possible)	With currently available evidence, it is not possible to reliably quantify the savings in administrative costs to businesses and savings in costs to HSE. However based on the number of businesses in the MVR sector and the potential types of cost saving that have been identified, the cost savings can be reasonably expected to be under £5 million per year.
Consultation:	This approach has been discussed with HSE's Chief Economist and the Better Regulation Team.
Chief Economists comments:	
Recommendation:	