

GUIDELINES FOR THE MANAGEMENT OF CARCINOGENS

PURPOSE

The purpose of this Guideline is to inform persons of the regulatory requirements governing carcinogens and the licensing requirements prior to use.

DEFINITIONS

Carcinogen: a cancer-causing agent. Some chemicals may be considered to be a suspected carcinogen on the basis of animal or related studies or by belonging to certain chemical classes.

Schedule 1 carcinogenic substance: A substance (or any of its salts) listed in Schedule 1 to the National Model Regulations for the Control of Scheduled Carcinogenic Substances used as a pure substance or in a mixture containing 0.1% or more of that substance, but does not include *amosite* or *crocidolite*.

Schedule 2 carcinogenic substance: A substance (or any of its salts) listed in Schedule 2 to the National Model Regulations for the Control of Scheduled Carcinogenic Substances used as a pure substance or in a mixture containing 0.1% or more of that substance, but does not include *chrysotile* or *cyclophosphamide*.

Schedule 1 Carcinogenic Substances		
2-acetylaminofluorene aflatoxins 4-aminodiphenyl benzidine and its salts (including benzidine dihydrochloride)	chloromethyl) ether chloromethyl methyl ether (technical grade which contains bis(chloromethyl) ether)	4-dimethylaminoazobenzene 2-naphthylamine and its salts 4-nitrodiphenyl.
Schedule 2 Carcinogenic Substances		
Acrylonitrile; Benzene (when used as a feedstock containing more than 50% of benzene by volume); 3,3'-dichlorobenzidine and its salts (including 3,3'-dichlorobenzidine dihydrochloride);	diethyl sulfate; dimethyl sulfate; ethylene dibromide (when used as a fumigant); 4,4'-methylene bis (2-chloroaniline) (MOCA); 2-propiolactone;	o-toluidine and o-toluidine hydrochloride vinyl chloride monomer.

CATEGORIES OF CARCINOGENS (as defined by the Australian Safety and Compensation Council (ASCC) formerly the *National Occupational Health and Safety Commission (NOHSC)*)

(a) Category 1 - Established human carcinogens: those substances known to be carcinogenic to humans. There is sufficient evidence to establish a causal association between human exposure to these substances and the development of cancer.

Under the circumstances where substitution of less hazardous materials is technically not feasible, the use of these carcinogenic substances should be controlled to the highest practicable standard by the application of effective engineering control techniques and, where necessary, complemented by the use of appropriate personal protective equipment.

Routine monitoring of the workplace is essential for indication of control performance. In some cases, health surveillance and biological monitoring can indicate exposure and thus reveal the need for re-assessment of the control measures and work practices.

(b) Category 2 - Probable human carcinogens: are those substances for which there is sufficient evidence to provide a strong presumption that human exposure might result in the development of cancer. This evidence is generally based on appropriate long term animal studies, limited epidemiological evidence or other relevant information.

These substances should be treated as if they are carcinogenic to humans. Under the circumstances where substitution of less hazardous materials is not possible, exposures to these substances should be minimised to the lowest practicable levels. This should be achieved by the application of effective engineering control measures, revised work practices and, where necessary, complemented by the use of appropriate personal protective equipment. A program of routine air monitoring should be implemented to ensure that the process controls and work practices implemented are effective in minimising exposure. In some cases, health surveillance and biological monitoring can indicate exposure and thus reveal the need for re-assessment of the control measures and work practices.

(c) Category 3 Substances suspected of having carcinogenic potential: those substances which have possible carcinogenic effects on humans but in respect of which the available information is not adequate for making a satisfactory assessment. There is some evidence from appropriate animal or epidemiological studies, but this is insufficient to place the substance in Category 2.

Because these substances may be re-assigned to a more stringent category in the light of future research, their use should be reviewed and they should be used with caution. Exposures should be kept as low as practicable and in no cases should they exceed the established exposure standards.

CARCINOGENS – LICENCING, ACQUISITION AND RECORD KEEPING

Scheduled carcinogenic substances include Schedule 1 and Schedule 2 carcinogenic substances and are regulated under the Occupational Health and Safety Regulations 2007.

When Schedule 1 carcinogenic substances are used in a laboratory a license must be held, however in all other workplaces the use of Schedule 1 carcinogenic substances is prohibited.

When Schedule 2 carcinogenic substances are used at workplaces other than a laboratory a license must be held. However, when used in a laboratory a notification must be sent to VWA of an intention to use a Schedule 2 carcinogenic substance in a laboratory.

Applications for a licence must be signed by the Head of School or Department, forwarded to WorkSafe and include:

- the name and business address of the applicant; and
- the workplace address at which the carcinogenic substance is intended to be used; and
- the name of the carcinogenic substance; and
- the quantity of the carcinogenic substance intended to be used each year; and
- the purposes for which the carcinogenic substance is intended to be used; and
- a statement, supported by reasons, that the elimination or substitution of the carcinogenic substance is not practicable; and
- a description of the control measures intended to be put in place to eliminate risks or reduce risks so far as is practicable and a justification of those control measures; and
- the number of employees who might be exposed to the carcinogenic substance; and
- the name and address of the intended supplier of the carcinogenic substance.

A license expires 5 years after the day on which it was issued.

Notifications must be signed by the Head of School or Department, forwarded to WorkSafe and include:

- the name and business address of the person giving it; and
- the workplace address at which the carcinogenic substance is intended to be used; and
- the name of the carcinogenic substance; and
- the quantity of the carcinogenic substance intended to be used each year; and
- the purposes for which the carcinogenic substance is intended to be used; and
- a description of the control measures intended to be put in place to eliminate the risks associated with the use of the carcinogenic substance or to reduce those risks so far as is practicable and a justification of those control measures; and
- the number of employees who might be exposed to the carcinogenic substance; and
- the name and address of the intended supplier of the carcinogenic substance.

Information on scheduled carcinogens, including an application for a licence form, can be found on WorkSafe's website at:

<http://www.worksafe.vic.gov.au/wps/wcm/connect/WorkSafe/Home/Safety+and+Prevention/Health+And+Safety+Topics/Hazardous+Substances/About+the+problem/What+are+hazardous+substances/Scheduled+carcinogens>

EMPLOYEE RECORDS

Records must be maintained of **every employee** who works with a Schedule 1 and Schedule 2 carcinogenic substances in the workplace. The record must be authorized by the Head of School or Department and forwarded to the Human Resources Division where it will be retained on the employee's personnel file. These records must be retained for 30 years from the date the employee last worked with a scheduled carcinogenic substance.

The record must contain:

- the employees full name; and
- the employees date of birth; and
- the employees residential address during the period that the employee worked with the carcinogenic substance; and
- the name of each scheduled carcinogenic substance that the employee worked with at the employers workplace; and
- the period of time over which the employee worked with each of the scheduled carcinogenic substances.

At the time of termination of employment a written statement must be issued to an employee who has worked with a scheduled carcinogenic substance at the workplace. The written statement must contain:

- the name of any scheduled carcinogenic substance that the employee worked with at the employers workplace; and
- the period of time over which the employee worked with the scheduled carcinogenic substance; and
- details of how and where previously mentioned records may be obtained; and
- a statement advising the employee to have periodical health assessments and details of the types of tests that are relevant.

The employee notification and record form can be found on the OHS website at:

<http://www.latrobe.edu.au/hr/ohs.htm>

Contact the OHS unit for further guidance and information.