LETTERS TO THE EDITOR

doi:10.1093/occmed/kqi070

The NRL precedent?

Dear Sir,

Most involved in occupational medicine will know of recent legal and regulatory pronouncements relating to natural rubber latex (NRL). With the importance of precedent to legal interpretation, it seems sensible to speculate on the effect of NRL decisions elsewhere.

NRL, though not grown in the UK, is a natural (agricultural) product, and like so much plant based material, has the potential for sensitization. It is harvested and transferred to production facilities, where other sensitizers such as accelerators may be added. The products are ubiquitous in our lives, and include gloves, the gold standard for protection for many years. These do cause sensitization at work.

We know that NRL is legally a substance hazardous to health and under Regulation 7 of COSHH [1], ‘exposure’ must either be prevented or where this is not reasonably practicable, adequately controlled. Some have suggested NRL must go, though the regulatory view allows consideration of suitable alternatives within the scope of reasonable practicability. Hence the situation appears to be NRL gloves are out, unless there is no reasonable alternative for each particular situation.

Looking at precedent, perhaps another natural product this time grown in the UK is relevant. Wheat certainly causes sensitization and in the bakery it is mixed with sensitizers such as amylase, and resultant asthma is well recognized. The products are extensively used by the population and certainly are provided by employers for use ‘arising out of or in connection with work’. These products have the potential to cause allergy and intolerance.

Should we therefore assume that flour and wheat products are substances hazardous to health and hence our statutory duty is to ensure exposure is prevented? If not, why not? Suitable alternatives appear no defence, as a major proportion of the world do very well with rice. Risk assessment, real or perceived, also cannot be the answer, since Regulation 7 appears as an absolute requirement irrespective of risk.

Separate from UK law, there are fundamental ethical concerns here, such as equity between agricultural producers irrespective of country of origin. Sustainability too; with the potential for natural products to sensitize, what is the consequence for our planet if this fact, irrespective of risk, forces us to prevent exposure and hence adopt man-made industrial substitutes.

Irrespective of the future of NRL, I wonder if the absolute requirements of Regulation 7 are sensible or sustainable and would be interested in other occupational physicians’ thoughts.

C. J. Kalman
Salus Occupational Health and Safety, Centrum Park, Hagmill Road, Coatbridge ML5 4TD, UK
e-mail: chris.kalman@laht.scot.nhs.uk

References


doi:10.1093/occmed/kqi067

Re: Chemical, biological, radiological and nuclear terrorism: an introduction for occupational physicians

Dear Sir,

I read with interest Thornton et al.’s [1] paper looking at terrorism from the occupational physician’s stand point. There are certainly important aspects of terrorist risk and response relevant to our specialism, and about which our employers and clients will seek our advice.

I do, however, have concern regarding the radiation and nuclear aspects of the paper, which to my mind do not address the key areas of occupational medicine interest. Table 1 in listing industrial use as medical sources and nuclear power plants ignores a significant proportion of our society’s use of radiation and radioactivity available for terrorists’ consideration. The description of potential weapons as nuclear or atomic is not readily understandable and the terms themselves are not explained in the text.

In the section on hazard, there is no attempt to differentiate nuclear yield from devices that disperse radioactive material nor mention of terrorist triggers for industrial events for which detailed accident plans already exist and are in the public domain. The text has no discussion of the hazards of radiation vis-à-vis contamination, and in terms of radiation, there is no mention of deterministic effects. This leads to the important