



Atmospheric smoke exposure affecting postal workers

This review provides timely expert advice and union recommendations from the perspective of Victorian postal workers potentially exposed to bushfire smoke hazards, for urgent consideration during all immediate and future decision making about safe work during the 2019/2020 summer bushfire season and in the future.

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Review and recommended action

1 Background

The 2019-2020 summer bushfire disaster in southern and eastern Australia has led to unprecedented and widespread hazardous smoke exposure to a large number of people including outdoor workers, in major population centres including Sydney, Canberra and Melbourne, inter alia.

Unlike fireground smoke exposure by emergency personnel, atmospheric smoke exposure by non-emergency workers is a relatively newly recognised occupational hazard in Australia.

In the last two weeks, public health and safety agencies have brought a sudden and sharp focus onto risk management of outdoor workers. Main countermeasures proposed by Australia Post include use of personal protective equipment in the form of P2 masks, and restrictions on outdoor work.

Excerpts and/or dot point summaries from information released by Australia Post and by relevant authorities are reproduced below. The excerpts are selective.

2 Consultation process

The purpose of this review is to provide timely expert advice and union recommendations from the perspective of Victorian postal workers potentially exposed to bushfire smoke hazards, in time to be considered prior to and during any further decision making relating to the remainder of the 2019/2020 summer bushfire season and beyond.

The information is provided in order to formally serve as part of consultation processes required by Australian Law (Commonwealth Work Health and Safety Act 2011, Sections 46-49, and relevant Regulations). Duty holders are required to communicate information to, and to consult with, workers and health and safety representatives.

The Communication Workers Union (Victorian Branch) requests that it be consulted by the Australia Post's State Incident Response Committee for Victoria, and would like to be involved in any way that can assist the assessment and management of risk to postal workers in the immediate and longer term.

3 Some key timelines – summer 2019-2020 – widespread exposure to bushfire smoke in Australia

Some key events relevant to Australia Post workers over the summer of 2019-2020 are summarised below.

| Date | What happened |
|-------------------------------|---|
| December 2019 to January 2020 | Extreme heat across the whole of Australia. Large scale bushfires break out affecting all states. Intense smoke from fires pollutes major cities, with Canberra and Melbourne rated as most polluted cities in the world at times. Postal deliveries in Canberra cease for multiple days. |
| 2 January 2020 | Communication Workers Union (Victorian Branch) notified of fire smoke being drawn into the Melbourne Parcel Facility by the evaporative cooling system. P2 masks issued to workers. |
| 6 January 2020 | Fact sheet issued by the Australian Acting Chief Medical Officer and State and Territory Chief Health Officers: <i>Advice on the use of masks for those exposed to bushfire smoke.</i> |
| 8 January 2020 | Australia Post releases a guidance note regarding <i>Hazardous Conditions</i> relating to bushfire smoke. |
| 13 January 2020 | A health and safety representative at a delivery centre in Melbourne's outer north east, confronted by an EPA rating of <i>Hazardous</i> smoke conditions in his designated working group's area, issued a Provisional Improvement Notice aimed at keeping postal delivery officers safe on days of hazardous smoke exposure. |
| 15 January 2020 | Worksafe Victoria issues guidance note <i>Health risks of outdoor work in areas impacted by bushfire smoke</i> |
| 17 January 2020 | Comcare officers visit postal the delivery centre in Melbourne's outer north east to investigate the PIN notice issued on Monday 13 January (above). They consult with management and separately with the health and safety representative and his advisors from the Communication Workers Union (Victorian Branch). |

4 Australian Acting Chief Medical Officer and State and Territory Chief Health Officers: *Advice on the use of masks for those exposed to bushfire smoke* (6/1/2020)

Some key points:

- Wearing a P2 mask can make it more difficult to breathe.
- Those with underlying heart or lung conditions should consult their doctor for advice before using a P2 mask.
- If the P2 mask becomes damaged, soiled, moist or contaminated, it is best to refit and replace or remove it.
- On average, masks may need to be replaced three to four times per day depending on the level of physical activity and subsequent build-up of moisture.
- Wearing a P2 mask can increase the risk of heat-related illness.

5 Comcare: *Poor Air Quality: What are your WHS obligations?* (6/1/2020)

Some key points:

With bushfires impacting communities across Australia, Comcare would like to advise PCBUs (Persons Conducting a Business or Undertaking) of their obligations under the *Work Health and Safety Act 2011* and *Work Health and Safety Regulations 2011*.

PCBUs must ensure they provide and maintain a safe working environment for their workers in indoor and outdoor environments so as far as is reasonably practicable.

Indoor working environments

PCBUs should ensure that indoor environments are safe and without risks to health for workers during periods of elevated smoke. PCBUs should:

- work with their property management, such as building landlords, to monitor the air quality of their buildings or workplaces
- act if the air quality is not within the acceptable levels
- keep staff informed of the measures taken.

PCBUs can contact Comcare via WHS.help@comcare.gov.au for further information.

Indoor air quality

There is no single Australian standard that addresses acceptable indoor air quality.

PCBUs should work with their property teams and/or building landlords to address any concerns about indoor air quality resulting from bushfire smoke.

Outdoor working environments

PCBUs should ensure that outdoor or field work is rescheduled until conditions (e.g. visibility and air quality) improve. However, if work needs to go ahead PCBUs should take the following steps:

- Appropriate risk assessments should be undertaken prior to work commencing.
- Appropriate personal protective equipment (PPE) such as face masks, should be provided to workers with instructions on its correct use and fitting.
- If workers are required to work alone, remotely or in an isolated place, PCBUs should ensure they always have an effective means of communication. Further information is available in the [Code of Practice: Managing the Work Environment and Facilities](#).
- PCBUs should remain aware of any bushfires near the proposed work area(s) and advise workers accordingly, including to follow instructions and advice from emergency services and evacuate the area if needed.
- PCBUs should monitor outdoor air quality levels via the appropriate State and Territory authority: [Air Quality in the ACT](#), [Air Quality Alerts NSW](#), [EPA Air Watch Vic](#), [Air Quality Monitoring SA](#), [Air Quality Qld](#), [Air Quality WA](#), [Bushfire smoke advice in Tas](#), and [NT Health Alert](#).
- PCBUs can also access information on particulate matter relevant to elevated smoke levels via [NSW Health](#) and [ACT Health](#).

6 Australia Post: *Guidance Note (8/1/2020)*

Some key points:

- State Incident Response Committee to assess and manage risk and operations.
- Committee to consult and advise unions on a regular basis.
- Adopts Air Quality Index, applying community exposure recommendations.
- Separate recommendations are suggested for indoor and outdoor work, and for health and sensitive individual (four combinations in total).

7 WorkSafe Victoria: *Health risks of outdoor work in areas impacted by bushfire smoke (15/1/2020)*

Some key points:

Air quality and recommendations

The information below provides guidance on what level of physical activity is safe to do in different levels of air quality, and recommended respiratory protective equipment. Employers should undertake an assessment of their specific work activities to determine the appropriate risk controls.

Physical activity

- **Light** physical activity includes sitting with light manual work with hands or hands and arms, and driving. Standing with some light arm work and occasional walking.
- **Moderate** physical activity includes sustained moderate hand and arm work, moderate arm and leg work, moderate arm and trunk work, or light pushing and pulling. Normal walking.
- **Heavy** physical activity includes intense arm and trunk work, carrying, shovelling, manual sawing, pushing and pulling heavy loads, walking at a fast pace.

Most postal delivery work is **Moderate** physical activity.

(a) Very Poor Air Quality: Limiting healthy workers' exposure

Recommended advice: general population (not sensitive):

- Avoid undertaking heavy physical activity outdoors
- Reduce time spent doing moderate physical activity outdoors

For anyone indoors, including vehicle cabins, close the doors and windows to prevent smoke and dust entering the workplace. Switch air conditioners to recycle or recirculate, to eliminate or minimise the requirement for outside air. Do not use an evaporative air cooler.

Recommended respiratory protective equipment:

If employee is required to do *light physical activity outdoors* for minimal (short) period of time:

- P2 disposable mask may be used as a precautionary measure.

If employee is required to do *moderate physical activity outdoors* for short periods of time, they should wear a P2 disposable mask. Employers should consider:

- limiting the period of time spent outdoors
- ensuring the P2 mask fits well to achieve air-tight seal
- males must be clean shaven
- masks fitted with exhalation valve may make it easier to breathe when doing physical activity
- regular replacement of P2 disposable masks should occur if they become damaged, moist or contaminated

If an employee has facial hair, a P2 disposable mask will not provide protection. The employee should:

- avoid working outdoors if possible
- not undertake moderate to heavy physical activity outdoors
- break up the day with time being spent indoors in a clean air environment and less time spent outdoors
- Employers should restrict the requirement for an employee with facial hair to carry out physical activity outdoors in weather conditions that are rated very poor.

(b) Hazardous Air Quality

Recommended advice:

General population (not sensitive):

- Avoid working outdoors
- If going outdoors is unavoidable, only do light physical activity and minimise the time spent outdoors as much as possible.

For anyone indoors, including vehicle cabins, close the doors and windows to prevent smoke and dust entering the workplace. Switch air conditioners to recycle or recirculate, to eliminate or minimise the requirement for outside air. Do not use an evaporative air cooler.

Recommended respiratory protective equipment:

As for Very Poor air quality (above).

8 Conclusions and Recommendations (CWU Vic Branch 22/1/2020)

- 1 A formal risk assessment should be developed and documented in consultation with workers, elected health and safety representatives, and the Communication Workers Union (Victorian Branch). This should include smoke exposure, usability and durability of P2 masks, and the current and future use of evaporative cooling in buildings.
- 2 Decision making, review and action should proceed as a matter of urgency.
- 3 A formal ongoing consultation process for workers and representatives should be developed, agreed and commenced as soon as possible.
- 4 There should be a preparedness to update procedures and advice frequently, as new information and experience are gained. An agile response is appropriate at this time.
- 5 There should be an immediate (within days) attempt to quickly engage with potentially affected workers via suitable qualitative assessment techniques, such as documented toolbox two-way consultations, simple online surveys etc. This is quicker than more rigorous processes and will act as part of formative evaluation, to inform ongoing decision making.
- 6 Key issues are: reasonable practicability of control measures, including but not limited to the following issues.
 - Usability and comfort of different types of P2 mask, including those with exhalation valves
 - fit of masks
 - overheating and fogging of glasses due to the mask
 - durability of masks and frequency of replacement throughout shift due to damage, moisture, soiling or contamination
 - potential obstruction of parts of the peripheral visual field of workers, particularly in relation to safety in road traffic for all delivery workers.
- 7 The *Australia Post guidance note* should be reviewed and updated immediately taking into account the WorkSafe Victoria guidance note, which is the most authoritative, up-to-date and relevant statement by a workplace health and safety authority in Australia.
- 8 In particular outdoor work should cease where and when Hazardous Air Quality exists, as at relevant nearby monitoring stations. If there are differences between monitoring stations in the areas near the working area, the worst of these ratings should be heeded, not the best.
- 9 Australia Post should advise workplaces with evaporative cooling systems not to operate them during *Very Poor* or *Hazardous* air quality conditions.
- 10 Evaporative cooling should not be installed in any future Australia Post workplaces where business continuity is essential, regardless of geographic location.
- 11 In mid 2020, after the end of the summer fire season in Australia, policies and procedures should be formally and rigorously reviewed, in consultation with Communication Workers Union Victorian Branch, using appropriate existing or new consultative structures and procedures. The aim is to enter future fire seasons with robust, workable policies and procedures for smoke exposure to postal workers, indoor and outdoor.

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