

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Other: Occupational Hygiene Consultant

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

11. How would the initial Board be established?

COMMENT:

Nice job on this governance portion.

QUESTION 1

The governance principles that guided the development of the governance model are inclusive, effective, credible, impact-driven, pragmatic and efficient. From your perspective, does the proposed governance model meet expectations for consistency with these principles?

Response: 4: Exceeds expectations

QUESTION 2

Does the proposed governance model ensure no single group is able to unduly influence decisions?

Response: yes

Document:
Assurance

4. Consolidated Standard External Assurance Process

COMMENT:

I would like to see the action of "documenting" used more throughout the assurance piece here.

QUESTION 1

From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 3: Meets expectations

Needs more use of the task of "documenting" when an action is taken. This is particularly important to assurance.

Document:
Standard

Performance Area 1: Corporate Requirements

SECTION: 1.5 Crisis Management and Communications, Leading Practice, 1

COMMENT:

1.5 Crisis Management and Communications Leading Practice Amend #1 to "Conduct and document a full crisis" P. 14

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Good Practice, 1

COMMENT:

Amend #1 to "Conduct and document an internal review"

SECTION: 2.1 Legal Compliance, Leading Practice, 1

COMMENT:

Amend #1 to "Conduct and document and internal audit"

SECTION: 2.2 Business Ethics and Accountability, Good Practice, 4

COMMENT:

2.2 Business Ethics and Accountability Good practice Amend #4 to "Conduct and document and internal review" P. 18

Performance Area 9: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Good Practice, 2

COMMENT:

#2 -great content on risk assessment, critical controls, industrial hygiene. Amend "'qualified hygienist" to "qualified occupational hygienist" per the International Occupational Hygiene Association (IOHA) National Accreditation Recognition scheme.

SECTION: 9.1 Health and Safety Management, Leading Practice, 2

COMMENT:

#2 -great content on industrial hygiene. Amend "qualified hygienist" to "qualified occupational hygienist" per the IOHA National Accreditation Recognition scheme.

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice

COMMENT:

9.3 Training, Behaviour, and Culture Leading Practice p. 53, Consider adding the qualities listed in models such as the Dupont Bradley curve, in describing the desired interdependent health and safety culture; i.e., Help others perform, Being others' keeper (mutual caring), Network contributor, Care for others, Organizational Pride, high performing teams

SECTION: Glossary and Interpretive Guidance

COMMENT:

Performance area 9, page 55 Definition of Industrial hygiene, Consider amending "Industrial Hygiene" to "Occupational Hygiene" as it is a more globally recognized term or amend to "Industrial/Occupational Hygiene" (to indicated that the terms are interchangeable and it is the same scientific discipline). Note I am the current President of the International Occupational Hygiene Association (IOHA) the umbrella association to which national accreditation and professional associations belong (we have 43 member associations around the globe)

Also use the definition provided by IOHA, that is: "Occupational Hygiene is the discipline of anticipating, recognizing, evaluating and controlling health hazards in the working environment with the objective of protecting worker health and well-being and safeguarding the community at large." <https://www.ioha.net/about/>

Performance area 9, Definition of Industrial hygiene program p. 55

Amend the third bullet to include other hazardous agents than just contaminants, as contaminants only implies "chemicals"

The following amendment is suggested:

"quantitative evaluation of exposures to chemical, biological, and physical agents (such as radiation, noise, thermal stress, vibration)"

And note that occupational hygiene includes ergonomics and psychosocial risks.

Consider amending the fourth bullet to read:

"controlling risk of exposure to below the prescribed occupational exposure limit and preferably to as low as reasonably achievable (ALARA), based on the application of the NIOSH hierarchy of controls"

As elimination is the preferred control based on the application of the NIOSH hierarchy of controls, recommend amending fifth bullet to read:

"Evaluation of the effectiveness of controls in eliminating or reducing occupational exposures."

Performance area 9, page 55 Definition of Qualified hygienist -

The International Occupational Hygiene Association (IOHA) is the umbrella association for all accrediting and credentially associations around the globe. IOHA has a National Accreditation Recognition scheme to which all these associations belong and are recognized. Consider amending the definition to include wording that would recognize all recognized occupational hygiene associations around the world (i.e., would include BGC

and CIHs as well as CRBOH, AIOH, BOHS, others). The IOHA National Accreditation Recognition (NAR) Committee are custodians of the certification process and recognize national occupational hygiene associations who offer certification examinations. To promote global respect for and recognition of Occupational Hygiene Certification Programs organizations which meet or exceed the IOHA Model Certification Program can apply to become a member of NARC and are approved for a five-year cycle. Every five years organizations are re-assessed to ensure they continue to meet or exceed specific criteria and that they show how they continually improve their program.

Each recognized organization appoints an active representative that serves on the committee to uphold and complete NARC activities.

<https://www.ioha.net/national-accreditation-recognition-nar/>

Consider the following amended definition for "Qualified Occupational Hygienist": "A person who is qualified based on knowledge, training

and/or experience in accordance with, and earned credential from, a recognised credentialing organization that meets or exceeds the International Occupational Hygiene Association (IOHA) Model Certification Program. Examples include the Board for Global EHS Credentialing (and the Certified Industrial Hygienist or CIH credential), the Australian Institute for Occupational Hygiene (and the Certified Occupational Hygienist or COH) and other national equivalent professional organisations."

QUESTION 1

Does the scope, content, and narrative style of the consolidated standard meet your individual expectations and the collective industry expectation for responsible production practices?

Response: 3: Meets expectations

Some content is needed around documenting when something is conducted, and the industrial hygiene content needs more work (I am a CIH and the current president of the International Occupational Hygiene Association - IOHA)

QUESTION 2

Do the requirements meet your expectations for being sufficiently clear to support consistent and practical implementation and to achieve necessary performance improvement?

Response: 3: Meets expectations

needs more work

QUESTION 3

From your perspective, does the three-level performance structure (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an effective on ramp and clear articulation of good practice and effective path to continuous improvement?

Response: 3: Meets expectations

i really like the three performance levels. they are clear and well thought out and will support compliance and continuous improvement

Document:
Claims

Disclaimer

COMMENT:

Perhaps this "should not" could be a "shall not". Noting for confirmation.

QUESTION 1

We would value perspectives on a few additional questions related to threshold of performance associated with achievement claims. Please click here/ see page 11 of Reporting and Claims Policy.

Response: **No Response**

You will want to set a standard to uphold quality control including strong calibration of auditors/assurance providers