National Institute for Occupational Safety and Health (NIOSH) Prevention through Design (PtD) Workshop Closing Remarks

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I am going to end where we began on Monday and remind you of the remarks by Fred Manuele. We should all heed his insights and sagacity on this subject: “prevention through design is big, it is heavy,” and let me take the liberty to add, it will be hard, take time, patience, and commitment. It will require leadership, but I am confident that change will occur. Why do I think so? What makes me so sure?

Well, partly because there are sound business arguments for PtD, and partly because we can achieve demonstrable safety and health improvements. But more pragmatically, because we are witnessing similar significant changes occurring right now in another complex safety arena. It involves some remarkably analogous decades-old legal, cultural, organizational, and professional barriers that have driven the way safety gets practiced, and like PtD, have often contributed to less-than-optimum safety performance. And that issue is the area of contractor safety and host employer-contractor relationships.

Over the past decade there has been a slow evolution, which is far from complete, from the long-standing, almost universal hands-off, non-collaborative relationships that have existed between host employers and contractors. There is a new and accelerating recognition by industry leaders, on both sides of the relationship, that there are sound and even compelling business benefits, as well as strong social responsibility arguments, for keeping contract workers safe. Ultimately, reduced risks of legal liability are contributing to breaking down the traditional barriers, and are resulting in more host employers and contractors jointly embracing responsibility and accountability for contract worker’s safety.

For many of these same business, social responsibility, and legal reasons are persuasive for convincing those involved in the design, engineering, and manufacture of equipment, supplies, and facilities on the one hand, and their business customers, whose workers are affected on the other, to adopt a similar collaborative philosophy. They also are altering the deeply-embedded policies and practices that have previously prevented a shared commitment to optimum safety and health performance.

And so I am very confident in marking this occasion as the unofficial beginning of a similar multi-year, maybe multi-decade, but I think inevitable, evolutionary process in PtD. And thanks to the pioneering work of Fred Manuele and Wayne Christensen, and others, we are already seeing progress described during the course of this workshop. But just as with the contractor safety issue, and as we have heard here over these three days, to be successful, certain policy, systemic, and operational things must happen:

- National safety and health leaders in government (NIOSH and the Occupational Safety and Health Administration, in particular) and in professional, business, and labor organizations need to continue to spearhead this ongoing, coordinated effort to focus attention on the benefits of embracing PtD, with initiatives along the lines suggested by Fred Manuele
- Senior leadership in business organizations must expect and demand, from their internal and external supply chains, that worker safety and health considerations be part of design and engineering decisions
- As with the contractor safety issue, senior leadership must tell their lawyers that business imperatives necessitate change, and that new creative approaches to minimizing legal risk must be developed

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Management systems must integrate PtD and engineering considerations in hazard reviews, risk assessments, and the development of control strategies. This means that the safety and health professionals, and the affected workers, must have a seat at the design, engineering, and procurement tables, and designers and engineers must understand how to integrate worker safety and health principles and approaches. We must develop more and better data to demonstrate the value of PtD. And we must continue to push for improved education of design and engineering professionals on worker safety and health considerations.

There are certainly challenges ahead, but this workshop, and the action plan and follow-up work it spawns, will make a difference. Finally, on behalf of the several co-sponsors of this workshop, I want to thank John Howard, in particular, for his leadership, Paul Schulte, Rick Rinehart and the NIOSH team, for organizing this intensive effort, and all the participants who dedicated their time and energy to making this a landmark occasion.