

Position Statement from HFESNZ on the Health and Safety at Work Act Amendment Bill

The Human Factors and Ergonomics Society of NZ exists to promote human factors and ergonomics knowledge and advance research, education and public awareness of human factors and ergonomics

The HFESNZ is rather surprised and highly concerned that the Health and Safety at Work Act Amendment Bill has chosen to prioritise critical risks in workplaces. It is more likely we will see the unintended consequences of more serious harm around both musculoskeletal harm and psychosocial risks not being addressed through a preventive approach. While prioritising critical risks is essential in a risk management framework, this is also likely to downplay the significant harm that workers face from poor ergonomics and lack of work and job design; musculoskeletal disorders and psychosocial harm.

When examining ACC data across the sectors of manufacturing, retail, wholesale, transport & logistics, there continues to be high levels of claims for injuries relating to the back/spine, hand/wrist and upper/lower arm. Such injuries are often where human factors and ergonomics has not been considered in the work design process. Over the last ten years this has cost New Zealand \$280 million in new claims costs and in 2025, \$172 million in new and active claims. These data do not include the high-risk sectors for musculoskeletal harm of construction and healthcare. Examining injuries associated with lifting and carrying, this has cost New Zealand \$614 million in the last 10 years, in 2025, the cost of new and active claims was \$136 million. These numbers do not include those people with cumulative damage over time.

The proposed change to focus on critical risks is not going to reduce these numbers and could potentially make things worse. The shift away from a more balanced framework that encourages prevention of all risks by all PCBUs regardless of size, including work-related musculoskeletal harm, is not going to address the significant harm and cost resulting from such risks.

SMEs make up 97% of businesses in Aotearoa New Zealand and are the backbone of many sectors. However, they are often in more precarious situations with limited funding available and little support. The proposed legislation suggests that SMEs should focus only on their critical risks. International research highlights that SMEs have more fatalities and serious injuries when compared with larger organisations. There is a gap in the health and safety support available to SMEs compared to large businesses. Furthermore, enabling SMEs to focus primarily and only on critical risks will again highlight that gap. Without supporting our SMEs to understand workplace health and safety, never mind critical risks, we are not going to see a reduction of harm that the Minister would like to see.