

## How to submit this form

# Submission form: Seeking proposals for additions to the list of occupational diseases under the Accident Compensation Act 2001

The Ministry of Business, Innovation and Employment (MBIE) would like your suggested additions to Schedule 2, the list of occupational diseases in the Accident Compensation Act (2001). Please provide your feedback by **5pm, on 17 May 2023**.

When completing this submission form, please provide specific occupational disease names, their relevant exposure, and any data that may aid your submission. Your feedback will help inform decisions about the list of diseases that MBIE will provide to independent researchers and medical experts for their analysis.

We appreciate your time and effort taken to respond to this consultation.

## Instructions

### To make a submission you will need to:

1. Fill out your name, email address, phone number and organisation.
2. Fill out your responses to the discussion document questions. You can answer any or all of these questions in the **discussion document**. Where possible, please provide us with evidence to support your views. Examples can include references to independent research or facts and figures.
3. If your submission has any confidential information:
  - i. Please state this in the email accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 (Official Information Act) that you believe apply. MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act.
  - ii. Indicate this on the front of your submission (e.g. the first page header may state "In Confidence"). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
  - iii. Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 1993 also applies.

## How to submit this form

### 4. Submit your feedback:

i. As a Microsoft Word document by email to [ACregs@mbie.govt.nz](mailto:ACregs@mbie.govt.nz) with subject line:  
*Consultation: Suggested additions to Schedule 2*

ii. By mailing your submission to:

The Manager, Accident Compensation Policy  
Ministry of Business, Innovation and Employment  
PO Box 1473

Wellington 6140  
New Zealand

## Submitter information

### Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

#### Your name, email address, phone number and organisation

Name:

Privacy of natural persons

Email address:

Privacy of natural persons

Phone number:

Privacy of natural persons

Organisation:

NA

- The Privacy Act 1993 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions or a summary of submissions received to MBIE's website at [www.mbie.govt.nz](http://www.mbie.govt.nz). If you do **not** want your submission or a summary of your submission to be placed on our website, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

#### Please check if your submission contains confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential, and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

## Seeking proposals for additions to the list of occupational diseases under the Accident Compensation Act 2001

### Seeking proposals for additions to the list of occupational diseases under the Accident Compensation Act 2001

1. Do you think there is relevant evidence to support including new occupational diseases to Schedule 2 at this time?

- Yes       No       Not Sure

2. If yes to Question 1, what occupational diseases should be added to Schedule 2?

[insert response here]

- Occupational cancers arising from exposure to gases, materials and toxins in the course of firefighting and attending calls as part of employment with Fire and Emergency New Zealand. Cancers may include (but are not limited to) lung cancer, skin cancer, thyroid cancer and leukaemia.
- Post-traumatic stress disorder arising from prolonged exposure to traumatic situations in the course of attending calls. Not only the fires and motor vehicle accidents that can lead to serious injury and death to members of the public, firefighters also co-respond with St Johns ambulance staff and are witness to a new range of medical events including suicide and child deaths.

3. For each occupational disease suggested in response to Question 2, what should be listed as the corresponding:

- a. agents, dusts, compounds, substances, radiation or things, and
- b. if appropriate, the relevant level or extent of exposure to these; or
- c. occupations, industries, or processes? **The relevant occupation in firefighting – cover should be offered to both volunteer and career (paid) firefighters.**

4. Do you think there is relevant evidence to support including additional exposures for occupational diseases currently included in Schedule 2?

[insert response here]

Yes. US info on cancers amongst firefighters found the following list of cancers to be more prevalent than in the general public:

- testicular cancer (2.02 times greater risk);
- multiple myeloma (1.53 times greater risk);
- non-Hodgkin's lymphoma (1.51 times greater risk);
- skin cancer (1.39 times greater risk) ;

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- malignant melanoma (1.31 times greater risk);
- prostate cancer (1.28 times greater risk);
- brain cancer (1.31 times greater risk);
- colon cancer (1.21 times greater risk);
- leukemia (1.14 times greater risk);
- and breast cancer in women (preliminary results).

Source <https://www.mass.gov/info-details/occupational-cancer-in-the-fire-service>

The World Health Organisation agrees with the carcinogenicity of firefighting and published this <https://www.iarc.who.int/news-events/iarc-monographs-evaluate-the-carcinogenicity-of-occupational-exposure-as-a-firefighter/>

As for the PTSD arising from being a firefighter, there is a growing body of information about the mental health of all first responders being at risk. Even retired firefighters are at risk of decreasing mental health and should be able to access help via ACC.

Beyond the nature of the events they respond to, firefighters also experience sleep deprivation from working night shifts and are under-supported by managers in their organisation which can compound into burnout and stress.

Source: <https://pubmed.ncbi.nlm.nih.gov/26607303/>

Additional source: lived experience, I am married to a firefighter.

5. If yes to Question 4, for each relevant current occupational disease, what should be listed as the corresponding additional:
- a. agents, dusts, compounds, substances, radiation or things, and
  - b. if appropriate, the relevant level or extent of exposure to these; or
  - c. occupations, industries, or processes? **Firefighters from FENZ**

[insert response here]

*If you have suggested including a new occupational disease or diseases, and/or additional exposures, please provide links and/or references to supporting evidence.*

*Where relevant, please include information on how the disease or diseases affect different populations, including impacts on different genders.*