

Canadian Committee on Indoor Air Quality and Buildings (CCIAQB)

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Indoor air quality is a very complex issue and there is currently a significant gap between knowledge of the effects of indoor air quality on the health of occupants and the effectiveness of various air quality technologies and solutions. User discretion is advised.

Preamble

The objective of the CCIAQB is, ultimately, to improve indoor air quality for all Canadians in every type of building. The CCIAQB has decided that its initial focus should be on buildings where many Canadians spend time outside their home, working, learning, shopping, being entertained, etc. For the most part, these buildings have relatively complex heating, ventilating and air conditioning systems that are operated and managed by knowledgeable persons. The table below gives examples of buildings that are covered using the classification found in the National Building Code of Canada (NBC). Documents produced by the CCIAQB are primarily intended for the use of building operators and facility managers, but the information contained in the guides can be helpful to anyone seeking a general understanding of indoor air quality issues.

The Committee welcomes feedback on the documents as well as ideas for the development of new materials. Contact the CCIAQB Secretary at info@IAQforum.ca or register on the website at www.IAQforum.ca

NBC Classification	Examples
Group A, Division 1	Theatres, movie theatres and other facilities for the performing arts
Group A, Division 2	Art galleries, museums, libraries, educational facilities (schools, colleges and universities), gymnasia, air and rail terminals
Group A, Division 3	Arenas and swimming pools
Group C	Apartments, hotels, college residences
Group D	Offices, including medical and dental offices
Group E	Department stores, supermarkets, shops, retail space

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Guide for Indoor Air Quality Module 6: Scent-Free Buildings

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1. Purpose of This Module

This Module provides building owners and managers with information about the sources and effects of scents and fragrances. It also suggests ways to move toward scent-free buildings. The information covers scents and fragrances brought into a workplace by people wearing personal products such as perfume as well as those scents and fragrances that originate from custodial products such as washroom hand soap.

This document is part of a series of modules forming the CCIAQB *Guide for Indoor Air Quality* available at www.IAQForum.ca. For definitions and acronyms, refer to *Module 1 – Introduction to Indoor Air Quality (IAQ)*.

2. Scents and Fragrances: What They Are

Scents and fragrances can originate from a number of personal products such as:

- fragrances, perfumes and body sprays
- colognes and aftershaves
- hair sprays, shampoos and conditioners
- deodorants
- hand-washing soap
- lotions and creams
- potpourris
- candles
- air fresheners and deodorizers

In addition, many cleaning products used by custodial staff emit scents. Module 3 – Custodial Activities, Maintenance, Repair and Renovation provides guidance on how to select cleaning products that minimize chemical emissions, including scents and fragrances. Before managers purchase custodial products, they should review the products' material safety data sheets, which are generally available on-line on the manufacturer's or supplier's website or can be ordered through a toll-free number. They should also conduct trials in designated areas before purchasing large quantities of a new product.

No precise definition exists for "scent-free", "fragrance-free" or "unscented" (Health Canada 2011, http://www.hc-sc.gc.ca/cps-spc/cosmet-person/cons/advertising-publicite-eng.php) and Canadian Centre for Occupational Health and Safety 2013, http://www.ccohs.ca/oshanswers/hsprograms/scent_free.html). This can be problematic as products claiming to be scent-free may actually contain chemicals that merely mask smells rather than being truly being "unscented." A fragrance-free product ought to be one in which no fragrance has been added and that uses no masking agent to hide its scents.

The labeling of personal care products is regulated by the Food and Drugs Act, the Cosmetic Regulations and the Consumer Packaging and Labelling Act. To comply, cosmetic labels must show:

- a list of ingredients
- the common or generic name of the product
- relevant directions, warnings or cautions for safe product use.

The term "fragrance" can be used to indicate a combination of compounds, possibly including phthalates, which are often found in personal care products—including nail polishes, deodorants, perfumes, colognes, aftershave lotions, shampoos, hair gels and hand lotions. Such compounds are rarely shown on labels, but product labels sometimes state "phthalate-free," which is helpful. The Government of Canada is currently assessing phthalates because of their potential to interfere with normal hormone function http://www.hc-sc.gc.ca/cps-spc/cosmet-person/cons/safety-innocuite-eng.php#a410.

3. Effects of Scented Products

Not all individuals are equally affected by the presence of scents and fragrances. For those affected noticeably, scented products can cause health problems such as sore throat, runny nose, sinus congestion, wheezing, shortness of breath, headaches, dizziness, anxiety, anger, fatigue, mental confusion, inability to concentrate, irritability, seizures, nausea and muscle pain. People who suffer from allergies or asthma may be particularly sensitive. Some of the chemicals used in synthetic fragrances have been associated in occupational and animal studies with developmental and neurotoxic effects, and cancer (see Canadian Coalition for Green Health Care: http://www.greenhealthcare.ca/projects/safer-chems/project3).

4. Legal Requirements

No legislation exists in Canada that requires public areas to be scent free.

The Canadian Human Rights Commission (CHRC) has recognized that individuals with environmental sensitivities experience various adverse reactions to environmental agents at concentrations well below those that might affect the average person. This medical condition is a disability; those living with environmental sensitivities are protected by the Canadian Human Rights Act, which prohibits discrimination on the basis of disability. The CHRC will process complaints from people who believe they have experienced discrimination as a result of environmental sensitivity. The CHRC encourages employers and service providers to proactively accommodate persons with disabilities by ensuring that workplaces and facilities are accessible for them.

To accommodate persons with environmental sensitivities, employers need innovative strategies to minimize or eliminate their exposure to certain environmental agents. Strategies may include: developing and enforcing fragrance-free and chemical-avoidance policies; using education to increase employees' compliance with such policies; minimizing chemical use; and notifying employees and clients in advance of construction, re-modeling and cleaning activities.

5. Scent-Free Buildings

A scent-free building is one where:

- The purchasing policy dictates that products routinely provided by building operators (such as hand soap) are not scented and that products such as cleaning solutions are carefully selected.
- A policy has been developed and implemented that makes building occupants aware of the problems that scented products can cause and that significantly reduces or eliminates the use of such products.

Some employers have indeed implemented such policies. They are effective tools that not only improve indoor air quality, but also increase workers' awareness of this important issue.

The owners of new buildings built to standards such as the Green Building Council's Leadership in Energy and Design (LEED) program may qualify for innovation credits by developing effective scent-free programs. To obtain credits, a policy must be actively implemented, for example by posting comprehensive signage and implementing awareness activities.

6. Implementing a Scent-Free Policy

Careful planning, consultation and implementation are required for a scent-free policy to be successful. Checklist 6.1 provides sample steps that might be used.

Checklist 6.1 Implementing a scent-free policy

- 1. Conduct a building-occupant survey to determine the extent of the issue. Collect opinions and suggestions to help develop a policy appropriate for a given building (for a sample survey, see Section 8, below—Sources of Additional Information, Reference 3.)
- 2. Involve the health and safety committee, and get management commitment from the beginning.
- 3. Develop the policy and consider how implementation, education and enforcement will take place.
- 4. Be sure that all employees have been fully informed of the policy and that they know what they have to do before the policy becomes effective.
- 5. Decide on wording for 'Scent Free' signs and where the signs will be posted.
- 6. Make it clear that the policy applies to everyone (including visitors). Let building occupants know that the policy will be reviewed and can be changed because of experience or new knowledge. Address employee concerns.
- 7. Ensure custodians post notices one week in advance when major maintenance work will be performed (e.g., floor waxing, carpet cleaning, shampooing, painting, spraying) so that sensitive individuals can make arrangements or have their duties modified.

Adapted from the Canadian Centre for Occupational Health and Safety

The Appendix to this document provides two examples of scent-free policies. Example 2 includes suggestions about how to monitor and enforce a policy.

8. Additional Steps

If an offending fragrance cannot be removed and an employee cannot be moved completely away from the fragrance, it may be possible to reduce the employee's exposure to an acceptable level. This usually means providing a private office with its own ventilation or positive pressure, an air purifier/cleaner, or a teleworking arrangement.

9. Sources of Additional Information

Government of Canada. Canadian Centre for Occupational Health and Safety. Scent-Free Policy for the Workplace: http://www.ccohs.ca/oshanswers/hsprograms/scent_free.html

Canadian Lung Association. Policy for Developing a Scent-Free Workplace: http://www.lung.ca/_resources/DevelopingaScentfreePolicyforaWorkplace.pdf

Public Service Alliance of Canada (British Columbia): http://psacbc.com/health-and-safety/psac-scent-free-policy, search for "PSAC awareness kit on scent-free environments (chemical sensitivities/environmental illness)".

United States Access Board. (2000). Board Policy to Promote Fragrance-Free Environments: http://www.access-Building Management Committee.gov/about/policies/fragrance.htm

Government of Newfoundland and Labrador. Human Resources Secretariat. Scent Policy: http://www.exec.gov.nl.ca/exec/pss/working with us/scent.html

Appendix A: Examples of Scent-Free Policies

Example 1: Government of Newfoundland and Labrador Scent Policy

Policy Statement

The use of scented products in government workplaces is to be avoided to provide employees, clients and visitors with a healthy and safe environment.

Application

This policy applies to all employees. Bargaining unit employees should also consult their respective collective agreements.

Definitions

Scented products: products that have, or may have, a detrimental effect upon the health of other persons and may include, but are not limited to, cosmetic products (e.g., perfumes, aftershaves, colognes, shampoos and conditioners, soaps, body lotions, deodorants, etc.) and other products (e.g., air fresheners and deodorizers, candles, potpourri, essential oils, some laundry detergents, fabric softeners and cleaning products, etc.).

Fragrance-free or unscented products: products that contain no fragrances, or masking agents that hide the scents of other ingredients.

Responsibilities

Department

It is the responsibility of individual departments and central agencies to communicate and implement this policy to provide a healthy and safe environment for employees, clients and visitors.

Employee

It is the responsibility of employees to support a healthy and safe work environment as outlined by this policy.

General Conditions

Scented products are to be avoided in government workplaces. This policy is in effect 24 hours a day.

Where a department shares a building with other employers or individuals who are not subject to this policy, the department must still apply the policy to their own workplaces and take all reasonable and practical measures to minimize the effects of scents on their own employees who must work in these locations.

Wherever possible, workplaces will be required to find and use environmentally friendly and fragrance-free or unscented products. Employees are to avoid wearing scented products in the workplace.

Wherever possible, workplaces will be required to schedule major cleaning, renovation and construction jobs for when the least number of individuals is present in government workplaces.

Departments will take appropriate action to inform clients and visitors of this policy and to ensure that conditions of this policy are implemented and enforced.

Duty to Accommodate

Employees who suffer from medically diagnosed sensitivities to scented products will be accommodated as per relevant health and human rights legislation. Measures may include, but are not limited to, the posting of signs indicating a scent-free zone in the immediate work area of the affected employee.

Exceptions

Exceptions can be made for work sites that require the use of specialized industrial products, such as solvents, fuels, lubricants, asphalt mixes, etc. In those types of work environments, substances such as chemical vapours, volatile organic compounds, infectious agents and other hazardous materials should be addressed through the application of engineering controls, administrative controls, infection control policies and relevant labour legislation and regulations.

Requests for individual exceptions (i.e., for employees, clients or visitors) to this policy may be approved in extenuating circumstances, subject to the review and approval of the Deputy Minister.

Samples of posters used in Newfoundland and Labrador are shown in Figure 6.1.

Figure 6.1: Sample Newfoundland and Labrador posters



Example 2: Thunder Bay District Health Unit



Thunder Bay District **Health Unit**

SECTION: OCCUPATIONAL HEALTH AND SAFETY POLICY NO.: OHS-11-34

SUBJECT: Scent Safe Workplace

APPROVED BY: Senior Management DATE: May 9, 2012

1. PURPOSE

- 1.1 The Thunder Bay District Health Unit (TBDHU) is dedicated to providing a healthy and safe environment for our staff, students, volunteers, clients and visitors.
- 1.2 Scented products can cause a variety of health problems including, but not limited to: sore throat, runny nose, sinus congestion, wheezing, shortness of breath, headaches, dizziness, anxiety, anger, fatigue, mental confusion, inability to concentrate, irritability, seizures, nausea and muscle pain. Strongly scented products can trigger migraines.

 The ventilation systems of many buildings are not able to extract all chemicals from the air and instead re-circulate them.
- 1.3 Section 25(2) (h) of the Occupational Health & Safety Act requires that the employer take every precaution reasonable in the circumstances for the protection of the worker. This regulation requires the employer to limit the exposure of workers to chemical substances.
- 1.4 The purpose of this policy is to establish a procedure to deal with issues that may arise when staff, students, or volunteers show adverse symptoms from exposure to scented or fragrant products in the workplace.

2. POLICY

- 2.1 It is the policy of the TBDHU to create a healthy and safe environment for staff, students, and volunteers through providing a scent-safe workplace.
- 2.2 Scented and fragrant products are not to be worn or used in the workplace.
- 2.3 The Health Unit reserves the right to require an employee, student or volunteer to discontinue the use of a particular scented or fragrant product in order to accommodate another employee's sensitivity.
- 2.4 The TBDHU will endeavour to use unscented cleaning products, where possible. Where not possible, the scented product will only be used in places or at times where it is unlikely that employees, students or volunteers will be exposed to the product's scent.

3. PROCEDURE

Employees

- 3.1 Employees with scent sensitivities will advise their manager of their particular sensitivity to ensure that proper precautions and accommodations are in place to reduce the likelihood of exposure.
- 3.2 Employees with concerns about scents or fragrances associated with products used in the workplace should contact their manager to determine if an appropriate product substitution is available.

- 3.3 Where possible, the source of a scent or fragrance used in the workplace will be removed. If the source cannot be removed, an affected employee may have to be accommodated.
- 3.4 An employee who experiences a minor reaction from a product worn by another employee should:
 - 1) Attempt to resolve the issue by communicating their concern directly to the employee wearing the product, asking them to remove it.
 - 2) Report the issue to their manager/designate if the product cannot be removed or the employee refuses to remove it.
- 3.5 When an employee has a severe reaction to a scent or fragrance, the employee must:
 - 1) Immediately leave the affected area until it is safe to return.
 - 2) Report the incident to their manager/designate.
 - 3) Complete a Staff Incident Report (OHS-5).
- 3.6 When a product cannot be removed or an employee refuses to remove it, the manager of the area will follow-up with the employee wearing the product to reinforce this policy (see 3.10).

Clients and Visitors

- 3.7 If an employee notices a client/visitor wearing a scented or fragrant product and is not adversely affected by it, they will approach the client/visitor and:
 - 1) Educate the client/visitor about this policy
 - 2) Provide the client/visitor with a Scent Safe Brochure
 - 3) If necessary, inform the manager of the area, who will then follow the steps outlined in 3.9.
- 3.8 If an employee experiences a severe reaction from a scent or fragrance worn by a client or visitor, the employee must:
 - 1) Immediately leave the affected area until it is safe to return.
 - 2) Report the incident to their manager/designate.
 - 3) Complete a Staff Incident Report (OHS-5)
- 3.9 The manager will speak directly to the client or visitor about this policy and, at his or her discretion, may ask the client or visitor to reschedule their appointment if it is reasonable to believe that a health and safety risk will continue to exist for other staff, students, volunteers, clients or visitors with scent sensitivities.

Dealing with non-compliance

- 3.10 Employees and students who report to work wearing scented or fragrant products are required to make every reasonable attempt to remove the scent or fragrance. If an employee or student continues to report to work in non-compliance of this policy, standard disciplinary measures will apply. This may include asking an employee to return home to remove a scented or fragrant product.
- 3.11 If a volunteer, client or visitor is non-compliant, it should be reported to the manager of the area. The manager will speak to the volunteer, client or visitor directly about this policy.
- 3.12 If the volunteer, client or visitor remains non-compliant, they may be asked to leave.

Promoting Awareness

- 3.13 Scent Safe Workplace signage will be posted in visible locations on TBDHU property to ensure clients are aware of this policy. Signage will also be posted at staff entrances.
- 3.14 The Scent Safe Workplace policy and scent safety information will be posted on the Health Unit's website to educate the public and clients about this policy.
- 3.15 Where appropriate, a brief Scent Safe Workplace message may be included on Health Unit advertising, communication, and promotional materials (e.g. appointment cards, schedules, agendas, invitations) to help support a scent-safe workplace.

4. SCOPE

4.1 This policy and procedure applies to all TBDHU staff, students, volunteers, clients and visitors.

5. RESPONSIBILITY

- 5.1 Managers are responsible for training and educating employees on the Scent Safe Workplace policy and to ensure this policy is adhered to.
 - Managers will ensure that employees wearing a scented or fragrant product in the workplace make every reasonable attempt to remove the scent and do not wear or use the product again.
 - Managers will ensure that clients and visitors are informed of the Scent Safe Workplace policy.
- 5.2 The manager responsible for information systems/property will ensure that "odour free" or "low odour" products are purchased, when possible, and that vendors and contractors are notified of this policy.
 - The manager responsible for information systems/property will provide advanced notification to managers when extended cleaning, renovations, painting or construction will be occurring, and to post signage in visible locations to educate staff, students, volunteers, visitors, clients and contractors.
- 5.3 Employees must adhere to the Scent Safe Workplace policy and, if approached, refrain from wearing a scented product.
- 5.4 Human resources will ensure that new employees, students and volunteers receive orientation to the Scent Safe Workplace policy and training on the adverse effects that scented and fragrant products have on sensitive individuals.

6. DEFINITIONS

- 6.1 A scented or fragrant product is any product that emits a distinctly noticeable scent or fragrance strong enough to be perceived by others, including but not limited to: colognes, perfumes, after shave, soaps, lotions, powders, deodorants, hair sprays/products, cleaning products, air fresheners and deodorizers. Strongly scented flowers (e.g. lilies, hyacinths and hibiscus) that emit a distinctly noticeable scent or fragrance strong enough to be perceived by others are considered scented products.
- 6.2 Unscented means there have been no fragrances added to the cosmetic product, or that a masking agent has been added in order to hide the scents from the other ingredients in the cosmetic.
- 6.3 Severe reaction: An employee is unable to perform their duties and responsibilities after being exposed to a scented or fragrant product, resulting in lost-time and/or medical attention received beyond Standard First Aid.
- 6.4 Minor reaction: An employee is able to continue performing their duties and responsibilities after being exposed to a scented or fragrant product. A minor reaction may require the use of the Rest Area or Standard First Aid but does not result in lost-time and/or medical attention beyond Standard First Aid.

7. REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

- 7.1 Ontario Occupational Health and Safety Act and Regulations
- 7.2 Ontario Human Rights Code
- 7.3 HR-08-02-09 Discipline
- 7.4 OHS-5 Staff Incident Report

8. ATTACHMENTS

8.1 None

Module 6 – Scent-Free Buildings