

# NHCA Position Paper

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## NATIONAL HEARING CONSERVATION ASSOCIATION POSITION STATEMENT ON OSHA, THE OSHA NOISE STANDARD AND HEARING CONSERVATION AMENDMENT 1910.95

The National Hearing Conservation Association strongly supports preserving the existence of an OSHA-mandated hearing conservation program and a means for its enforcement.

Various surveys conducted over the past 20 years indicate that up to 40% of Americans employed in manufacturing facilities are exposed to potentially hazardous noise (85 dBA time-weighted averages or above). In 1981, the U.S. Department of Labor estimated that there were over five and one-half million workers in the manufacturing sector who were exposed daily to these potentially hazardous noise levels. The National Institute for Occupational Safety and Health (NIOSH) estimates that many of the additional 15-20 million workers employed in unregulated non-manufacturing industries (in particular, those in construction, agriculture, service, and trade industries) are also exposed to potentially hazardous noise. Today noise-induced hearing loss is the most prevalent of the ten leading occupational diseases and injuries identified by NIOSH.

Since 1975, injury and illness rates have fallen in industries in which OSHA has concentrated its enforcement activities—construction, manufacturing, and oil and gas extraction—while they have risen in other industries. NHCA believes that as one of the enforced regulations, the noise standard as amended in 1983, has helped to reduce hearing injuries, and to conserve the hearing of a great many American workers. The National Hearing Conservation Association strongly supports preserving the existence of an OSHA-mandated hearing conservation program and a means for its enforcement.

The NHCA believes it is short-sighted to expect that education alone, without adequate OSHA enforcement, will suffice to control hazards in the workplace. At a time when policy makers are attempting to reduce health care costs for the nation, eliminating or weakening OSHA mandates that enhance consumer education, and decrease illness, injury and related morbidity and mortality in the workplace, is counterproductive to budget-reduction goals.

Improved worker productivity and decreased noise-related accidents must be considered when analyzing the hearing conservation standard from a cost-benefit perspective. In addition, cost savings are found as they relate to decreased worker's compensation awards, hearing aid costs, hearing testing and rehabilitation.

Until engineering controls can reduce the full spectrum of hazardous noise to non-hazardous levels, a comprehensive hearing conservation regulation and a means for enforcement must continue.

*Adopted by the Executive Council: October 12, 1995*