

Reference:	EIR.19171.25 & 19212.26
Subject:	Formaldehyde
Date of Request:	22 December 2025 and 2 January 2026

Requested:

FOI.19171.25

Please provide the following information with regards to employee formaldehyde exposure in the Trust's gastrointestinal endoscopy suites.

Documents to disclose:

1. Please provide the formaldehyde exposure risk assessment that is currently used by the Trust's gastrointestinal endoscopy team to fulfil employer obligations under COSHH regulations (2002) Section 6.
2. Please provide *all* formaldehyde exposure monitoring data (both fixed static monitoring and personal badge monitoring, with personal details redacted as appropriate) relating to the Trust's gastrointestinal endoscopy service encompassing the last 12 months that is used to fulfil employer obligations under COSHH regulations (2002) Section 10. It is noted that such records should be kept available for at least 5 years under COSHH regulations (2002) Section 10(5)(b).
3. How often is regular scheduled formaldehyde exposure monitoring undertaken in the Trust's gastrointestinal endoscopy suite?
4. What is the total number of occasions formaldehyde regular scheduled exposure monitoring has been undertaken in the Trust's gastrointestinal endoscopy suites over the last 12 months?

FOI.19212.26

Please provide the following information relating to employee exposure to formaldehyde (formalin) in the Trust's operating/surgical theatres.

Documents requested:

1. Please provide the current COSHH risk assessment(s) relating to formaldehyde (formalin) exposure for staff working in operating/surgical theatres, produced to meet the Trust's duties under COSHH Regulation 6.
2. Please provide copies of all formaldehyde (formalin) exposure monitoring data held by the Trust for operating/surgical theatre staff for the last 12 months, including:
 - Fixed/static air monitoring results
 - Personal exposure or badge monitoring results (with personal data redacted as appropriate)

This request includes monitoring undertaken for any purpose, including baseline, verification, and/or investigation monitoring, in line with COSHH Regulation 10. It is noted that COSHH Regulation 10(5)(b) requires such records to be kept for a minimum of five years.

3. How does the Trust prevent or control employee exposure to formaldehyde (formalin) in its operating/surgical theatres, including but not limited to engineering, procedural, and/or organisational controls?
4. Does the Trust undertake regular scheduled formaldehyde (formalin) exposure monitoring in operating/surgical theatres? If so, please state the frequency.
5. Please state the total number of occasions on which regular scheduled formaldehyde (formalin) exposure monitoring has been undertaken in operating/surgical theatres in the last 12 months.
6. If regular scheduled formaldehyde (formalin) exposure monitoring is **not** undertaken, please provide documentation held by the Trust that demonstrates the effectiveness of current controls and supports the decision that routine monitoring is not required. If no such documentation is held, please confirm how the Trust assures compliance with COSHH Regulations 7 and 10 in the absence of routine exposure monitoring.

Response:

FOI.19171.25

1. Hywel Dda University Health Board (UHB) has applied an exception under Regulation 6 (1)(b) of the Environmental Information Regulations 2004 (EIR) to part of your request, as some of the information is accessible by another means. The risk assessment requested is included at appendix 1 of the following policy, and is available on the UHB's website:

- Policy 703 – Control of Substances Hazardous to Health (COSHH) Policy and Procedure

For ease, a link has been provided overleaf, which will take you directly to the policies and written control documents webpage:

[Policies and written control documents - Hywel Dda University Health Board](#)

The UHB's primary source of information relating to Formaldehyde is the '10% Neutral Buffered Formalin Safety Data Sheet', which is available on the CellPath website. A link to the relevant webpage has been provided below:

[nbfsdsenet.pdf](#)

Additionally, the UHB provides a copy of its completed substance-based COSHH Assessment, for CellStor 10% Neutral Buffered Formalin (10% NBF) 60mL pots, at Attachment 1.

2. The UHB confirms that it does not hold the requested information as the release of and exposure to vapour within its Gastrointestinal and Endoscopy areas is too low for monitoring to be necessary. Exposure monitoring is guided by risk assessment in line with Section 10 of the COSHH guidance, which states that 'exposure monitoring is not required if there are other ways of showing the risk is adequately controlled'. The UHB complies using engineering controls (mechanical ventilation), procedural methods (safe systems of work, product selection) and organisational means (including COSHH training for managers).

3. The UHB confirms that there is no schedule for Formaldehyde exposure monitoring within the Gastrointestinal and Endoscopy areas.
4. The UHB confirms that no Formaldehyde exposure monitoring has been conducted within the Gastrointestinal and Endoscopy areas, during the 2025 calendar year.

FOI.19212.26

1. In addition to Attachment 1, please find a copy of its completed substance-based COSHH Assessment for CellStor 10% Neutral Buffered Formalin (10% NBF) 1 litre/5 litre bulk liquid for manual dispensing, at Attachment 2.
2. The UHB does not hold the requested information as it does not undertake monitoring of Formaldehyde in its operating theatres. Exposure monitoring is guided by risk assessment in line with Section 2 General duties of employers to their employees under the Health and Safety at Work etc. Act (1974):

(1) It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.

It is expected that the cost, time, and effort required is to be in proportion to the severity and likelihood of the risk; due to the effectiveness of the ventilation system, the process used to handle the substance (filtered fume cabinet), and the low level of exposure when the pot is briefly opened. Exposure monitoring is not required as it is not “reasonably practicable” and the risk is well managed.

3. The UHB details overleaf the control measures in place to prevent employee exposure to Formaldehyde in its operating theatres:

Engineered controls:

- The highest risk task (handling bulk liquid Formalin) is conducted inside a filtered (activated carbon) and ventilated cabinet, serviced and specified in line with COSHH. Staff exposure to vapour is negligible during this process. The pots are sealed inside the cabinet.
- Ventilation in theatre environments is primarily for infection control purposes but has the effect of diluting and extracting vapours, together with the direction of airflow leading to inhaled air being likely to have originated from a clean source i.e. the worker is generally upstream of the Formalin.
- Operating theatre environments are fully compliant with the ventilation requirements of Welsh Healthcare Technical Memorandum 03-01 Part A.
- Operating theatres function with an air exchange rate exceeding the stated requirements, with laminar flow canopies (where they exist) delivering far in excess of required ventilation.

Procedural controls:

- Formalin containers are filled inside a ventilated cabinet, suitably labelled with hazard symbols, and are opened only momentarily while adding specimens. Exposure to Formalin vapour is expected to be extremely low, well below the Workplace Exposure Limit stated in HSE document EH40. The UHB is only required to keep exposure below the Workplace Exposure Limit, and as Formalin is not cytotoxic, the UHB is not required to maintain exposure “As Low As Reasonably Practicable” below this limit and are only required to maintain exposure below the limit.

- There are procedures for dealing with spillages.

Organisational controls:

- Over seven hundred (700) managers, including managers in Theatre/Day Surgery, have attended COSHH for Managers training delivered by the Health, Safety, and Security department.
4. The UHB confirms that there is no schedule for Formaldehyde exposure monitoring within its operating theatres.
 5. The UHB confirms that no Formaldehyde exposure monitoring has been conducted within its operating theatres, during the 2025 calendar year.
 6. The UHB does not hold documentation demonstrating the effectiveness of the current controls.

Regulation 10 of COSHH states that exposure monitoring is not required if the employer can show by other means that the risk is well controlled. The following assures the UHBs compliance:

- The Formalin solution in use is of low concentration with a low vapour pressure of 23mbar at 20degC.
- Aside from spillages, the duration of opening and the quantity of vapour that results is very small.
- Risk assessments - Provided at Attachments 1 and 2.

Additionally, the UHB's ventilation systems are audited and serviced annually and are compliant with COSHH and the Welsh Health Technical Memorandum (WHTM). A link to the WHTM has been provided below:

[WHE Estatecode 2009 web](#)

Copies of the service reports have been provided at the following attachments:

- Attachment 3 - Service Report WGH
- Attachment 4 - Report Summary DSU PPH
- Attachment 5 - Site Report PPH
- Attachment 6 - Site Report BGH
- Attachment 7 - Service Report BGH

The UHB is withholding the personal information of third parties, such as names, signatures and email addresses. This decision has been made as it is not within the reasonable expectations of these individuals that their personal data, would be released into the public domain. Accordingly, the UHB has applied redactions within the attachments provided, as this information is classed as personal data of a third party.

Therefore, it is being withheld in accordance with Regulation 12(3) in accordance with Regulation 13(1) and 13(2A) of the Environmental Information Regulations 2004 (EIR) which permits a public authority to withhold personal data other than the requestor's where the disclosure would breach Data Protection principles.

This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations (GDPR), as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.