

## Draft model WHS Codes of Practice and guidance - Public Comment Response Form

Complete and submit this form by **5PM AEST FRIDAY 24 AUGUST 2012** to  
[codes@safeworkaustralia.gov.au](mailto:codes@safeworkaustralia.gov.au)

1. Cranes	
Section/page no.	Comment
Major Inspection, pg 36	<p>A competent person carrying out non-destructive (NDT) testing on crane components should have suitable knowledge and experience in NDT methods, for example, an NDT specialist accredited by the National Association of Testing Authorities (NATA).</p> <p><b>Comment:</b> <i>The person conducting the NDT should be a member of, and be certified by, the Australian Institute of Non-destructive testing (AINDT), NDT practioner training/qualification governing authority, as this will set the minimum level of competence required. This is especially relevant to the small mobile businesses that necessarily don't have premises/laboratories and may find the expense of being quality accredited by NATA not financially viable.</i></p>
<p><b>Impacts:</b> Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?</p> <p><b>Comment:</b> <i>The associated costs of being NATA accredited for small one man mobile operations are a considerable financial burden that may push small crane companies to cut corners and/or practioners out of the area of expertise. NATA specialises in qualitative assessment/accreditation of facilities and their laboratories. This may not necessarily apply to those businesses that are not set up this way.</i></p>	