

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

1. Cranes	
Section/page no.	Comment
p.25	Second paragraph, second sentence: word should be “plant” not plan.
p.25 “Tower Cranes”.	To be consistent and unambiguous with Chapter 6, sections 291 and 299 of the National Regulations, a Safe Work Method Statement MUST be prepared. Currently, the word “should” is used. This will inevitably lead to unnecessary confusion and potential failure.
p.44, Section 6.3	In the third paragraph of this section “Working on suspended slabs” we suggest that the word “...physical” be inserted into the sentence prior to the word “barriers” (twice) to clearly articulate what is expected and what is required to prevent, not just prohibit, access to areas where the crane is working.
p.47, Section 6.5.	Add these highlighted words: “When other mobile plant is used as a mobile crane, the level of safety produced, including stability (of the plant under its’ potential load conditions) provided by the lifting set-up, should be at least equal to that when a mobile crane is used...”. The stability of a crane is a critical, but often forgotten factor when selecting and using the most appropriate and suitable crane, let alone when using other mobile plant as a mobile crane. Less stable and hence less safe pieces of plant are often selected in place of a crane merely for convenience sake. The code must make people aware of the dangers of this practice and highlight the importance of the entire and correct selection criteria.
p.47, Section 6.6	Under the heading “Erection and Dismantling” just above the second lot of dot points under “A safe work method statement should consider the following...” we suggest adding a further dot point to include the issue of ‘Exclusion / Operational Exclusion zones’. This will alert and hopefully reinforce to all stakeholders/participants the importance of having no person enter an agreed restricted area during erection /dismantling procedures, just in case tools or equipment are dropped during such activities. We suggest, as a minimum, a zone of 15 to 20 meters is referenced.
p.80	Under the heading “Crane proximity to excavations and trenches”, we suggest that a dot point be added stating: “Up-to-date and current compacted ground/soil test results by an approved/licensed Geotechnical engineer, using appropriate engineering and scientific calibrated equipment, be provided to objectively determine and measure ground/soil stability”.
Impacts: 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?	
2. Amusement Devices	
Section/page no.	Comment
Impacts: 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?	
3. Industrial Lift Trucks	
Section/page no.	Comment
p.4 Section 1.1	Insert an extra dot point under types of industrial lift trucks of “Manitou/telehandler”. Provide a photo of this type of plant/industrial lift truck in Appendix A.

p.17 Section 4.4	Under the heading “Shutdown” and the last dot point, delete the words “unless otherwise instructed...”. There are no reasonably practicable circumstances that would, could, or should prevent keys being removed from the ignition when this type of plant is parked and shutdown. If the machine needs to be moved, only a licensed and authorised person should be moving it. Potentially allowing (or tempting) others to move the machine if keys are left in the ignition, must be prevented.
p.19. Section 5.1	<p>“Loads – Suspended Loads”. When suspending loads, an industrial lift truck is performing and handling in a markedly different manner when compared to its’ primary designed function/purpose. Given that a suspended load carries and demands different responses and requirements from that of fixed/lifted load, we say that the operator must also require a non-slewing mobile crane licence. This will assist in providing the operator with a comprehensive level of knowledge and skill about the differences and importantly, the most appropriate responses to potential load movement and load shifting, which could readily affect the stability of both the load and the machine.</p> <p>We also recommend that if the lift truck is to be used in this manner, a further dot point referring to the requirement of anti-burst valves on the hydraulic hoses/mechanisms (where appropriate) should also be added.</p>
p.20 Section 5.2	“Work Platform/Cages”. Above comments also apply to this section.
Impacts: 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?	
4. Managing Risks of Plant used in Rural Workplaces	
Section/page no.	Comment
Impacts: 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?	
5. Managing Security Risks in the Cash-in-transit Industry	
Section/page no.	Comment
Impacts: 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?	
6. Managing Risks in Forestry Operations	
Section/page no.	Comment
Impacts: 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?	

7. Guide for Tunnelling	
Section/page no.	Comment
P5. Table 1.	The heading of the table is good however, the first box of the table states “Common tunnelling and excavation activities”. This table is not about activities, but about the hazards and risks during the activities. We suggest that this heading is misleading in terms of the contents of the table and should be deleted. The two next headings (“Examples of Specific Hazards and Risks” – and – “Examples Risk Control Measures”) provide adequate and sufficient information.
p.7 , 2.1 Responsibilities of duty holders	In the first paragraph, we suggest that the words “...Setting realistic timeframes” be highlighted and emphasised throughout the entire text. We also suggest that the timeframes of projects should be open to some type of measureable criterion. This could then be used to determine, via mature, meaningful and effective consultation with employee representatives, the adequacy and suitability of the timeframes/programs in direct relation to the project/s.
p. 9 Tunnel Design.	There should be another dot point added to three dot points in this section, stating, “...adequate supports during the construction of the tunnel”. This would then flow nicely onto the next section “Design Review for Construction”.
p.12	Strongly recommend that the 6 th paragraph “... At all working shafts, a standby means of communication should be available and able to be operated from any position throughout the depth of the shaft ” be highlighted in bold font. Such important text/message is sometimes (and unfortunately) lost in the detail of the document.
p.12&13 Workplace Facilities	The level of noise is another factor that needs to be taken into account when considering when considering where workplace facilities are to be established. We therefore recommend a further dot point be added at top of p.13 referencing “Noise of the work process/s”.
p.17	At the top of this page (3 dot points) a further dot point be added stating: “... <i>regular and on-going training of all persons allocated roles and responsibilities</i> ” (under the “First Aid and Emergency Plan”).
p.33 & 33: Monitoring Air Quality	It should be made explicitly clear that any testing and monitoring of the environment/air needs to be conducted by persons with suitable and appropriate qualifications, such as a registered hygienist with appropriate/applicable NATA testing facilities and equipment.
p.40 Plant Suitability and Assessment	To comply with the legislative requirements regarding consultation, and to further ensure such consultation is both meaningful and effective, we suggest the following text be added at the bottom of this page: “... <i>Such risk assessments should be conducted in an open and transparent manner, with full involvement from employees and their representatives, to ensure a considered and balanced approach is obtained, thereby leading to the most effective control measures...</i> ”.
Impacts: Do you anticipate any potential costs or safety benefits of complying with this guidance material that are different to current requirements in your jurisdiction? If so, what are they?	
8. Guide for Managing Risk in Cable logging	
Section/page no.	Comment
Impacts: Do you anticipate any potential costs or safety benefits of complying with this guidance material that are different to current requirements in your jurisdiction? If so, what are they?	