

**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)

<b>1. Cranes</b>	
<b>Section/page no.</b>	<b>Comment</b>
P10, Hierarchy of controls	<p>An important issue here is that elimination looks like part of control, when logically it is not. Elimination means the hazard or risk is no longer there; control means that it is still there though minimised.</p> <p>Moreover, we believe elimination requires more emphasis. It is a legislative requirement to first eliminate the hazard or risk, as far as is reasonably practical. Only when not reasonably practical to eliminate, do control measures come into consideration. This could be made clearer. A reader might be forgiven for opting for a control measure first, rather than elimination, since elimination seems to be just another of the available control measures.</p>
General comment	<p>This is a comprehensive draft code – 50 pages of text plus 36 pages of attachments. However, query whether this is perhaps too detailed, especially given:</p> <ul style="list-style-type: none"> <li>• All crane items require registration of design and/or item</li> <li>• Operators need to be trained.</li> </ul> <p>Is this amount of information really necessary eg sections on training and operating cranes, when the operators have been trained? The danger is that the document might not be readily accessed if there is a perception that the information is something the operator already knows.</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?	
<b>2. Amusement Devices</b>	
<b>Section/page no.</b>	<b>Comment</b>
<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?	
<b>3. Industrial Lift Trucks</b>	
<b>Section/page no.</b>	<b>Comment</b>
P11, section 2.3 controlling the risks	As above, suggest more emphasis placed on the legislative requirement to first eliminate the hazard or risk, as far as is reasonably practical. Only when not reasonably practical, do control measures come into consideration. Going to a control measure first, without assessing the possibility of elimination, would be a breach.
P17, section 4.2 Operating the industrial lift truck	This section seems too detailed, especially given that the operation of this plant requires a licence and hence has involved training of the operator.
<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?	

<b>4. Managing Risks of Plant used in Rural Workplaces</b>	
<b>Section/page no.</b>	<b>Comment</b>
P7, para 7, last sentence	This sentence would read better if transposed thus: “A worker should report any faults in the plant...as soon as they become aware of them, to their manager or supervisor”. Awareness is of the faults, not the manager or supervisor.
P10, last para The hierarchy of risk control	As above, suggest more emphasis placed on the legislative requirement to first eliminate the hazard or risk, as far as is reasonably practical. Only when not reasonably practical, do control measures come into consideration.
P20, last para	Insert word: “A manufacturer should <b>ensure</b> that...”
P29, section 4.5 Quad bikes	Suggest this section is possibly too detailed
General comment	While the code covers some rural plant well eg tractors, grain augers etc, other commonly used rural plant is completely left out. Consideration might be given to including information on the following: <ul style="list-style-type: none"> <li>• Chainsaws</li> <li>• Cutting and welding equipment</li> <li>• Forklifts (can refer to another code)</li> <li>• Shearing/wool bailing plant etc</li> </ul>
<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?	
<b>5. Managing Security Risks in the Cash-in-transit Industry</b>	
<b>Section/page no.</b>	<b>Comment</b>
<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?	
<b>6. Managing Risks in Forestry Operations</b>	
<b>Section/page no.</b>	<b>Comment</b>
<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?	
<b>7. Guide for Tunnelling</b>	
<b>Section/page no.</b>	<b>Comment</b>
<b>Impacts:</b> 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?