



SUBMISSION

Managing Risks in Forestry Operations

Draft Code of Practice

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

The Forest Industries Federation of WA (FIFWA) is the industry association for the timber industry in Western Australia. FIFWA is representative of almost all of the major companies and businesses that operate in the WA timber industry, including both the softwood and native hardwood timber harvest and haul operators and processors. FIFWA is also the custodian of the Safety and Health Code for Native Forest/Hardwood Logging and Plantation Logging in Western Australia.

In addition to comments provided on specific sections of the code (please see table below) we provide the following general comments about the Draft Code of Practice for Managing Risks in Forestry Operations.

1. Guidance on 'driving trees'

The practice of 'driving trees' - felling a second tree into another tree in order to bring down the first tree is not used as a first option in forestry practice in Western Australia. Our own Code favours the use of mechanical devices and blasting to bring down hung-up and hazardous trees, however in practice we find that where these other options are not available, fellers find that tree driving is a safer option than leaving the tree hung-up. In such circumstances a felling plan which may include tree driving is agreed between the feller and the supervisor or equivalent.

2. Use of holding wedges with trees that are manually felled with a chainsaw

We are supportive of the suggestion that a holding wedge should be used in all instances where a tree is felled with a chainsaw.

3. Location of the log truck driver when loading and unloading

When loading and unloading the truck we believe the truck driver should ordinarily be outside the cabin on the loading side of the truck at a safe distance either in front (minimum 4 metres) or behind (minimum 10 metres) the truck.

The only exception to this rule should be for plantation timbers or other small diameter debarked logs where it is essential for the truck driver to observe the loading process to ensure the safe loading of logs (e.g. ensure short logs are cradled by longer logs or held by 2 stanchions, not protruding from the truck). In this instance it is preferable for the truck driver to be on the opposite side of the truck to the loader, but not less than 15 metres away from the truck. In this instance the

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truck driver must maintain radio/hand held contact with the loader driver at all times.

In all instances if the log truck driver cannot be seen by the loader/unloader it is the loader drivers prerogative to stop operations until contact is re-established with the truck driver.

When loading/unloading woodchips we believe the truck driver should be able to return to the cab as there is no risk of large falling objects, and often the truck needs to be edged forward to ensure good loading.

4. Inclusion of required competencies

We are supportive of national units of competencies needed for undertaking various forestry operations being included in the code.

5. Reference to Australian Standards

Our practice has been not to include the specific wording of any Australian Standards in our own Code. We reference Australian Standards generally as guidance material, but not individual Standards or parts of Standards. We do not feel it necessary to reference particular technical standards.

6. Scope and Application

It is stated that the code applies to 'all forestry operations' yet it clearly does not. The national draft code for managing risks in forestry operations addresses forestry operations in relation to harvest, load and haul operations.

If the national code was attempting to address all procedures related to forestry operations then it would also need to cover establishment, and ongoing management issues which would include such topics as chemicals, aircraft, spraying, manual handling, fire, pests to name a few. In Western Australia we have a separate code of practice which specifically addresses plantation establishment and management and is very prescriptive and encompasses all relevant Western Australian legislation (e.g. water, fire).

We are not supportive of this code attempting to cover all aspects of forestry operations and feel strongly that the code should **only** focus of harvest and haulage procedures in relation to forestry operations.

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Additionally we note national model legislation covering road transport is being introduced throughout Australia. The new road transport national compliance and enforcement laws encompass the notion of 'Chain of Responsibility' which identifies all parties in the transport chain as responsible for the safe loading and transport of goods including; consignors, packers, loaders, owners, operators, drivers and receivers. These laws have far reaching implications for all operating in the forest industry.

Under the model legislation an alleged road offence maybe defended through evidence that the business or individual was compliant with a Code of Practice. However it is our understanding that the Code of Practice would have to deal specifically with the due diligence process in relation to chain of responsibility. We raise that if this 'Managing Risks in Forestry Operations' Code is to be the national Code of Practice for the industry, then this should also be the appropriate document to address this issue.

6. Managing Risks in Forestry Operations	
Section/page no.	Comment
5.6 Unauthorised entry to coupe/harvesting sites	<p>While we recognise a responsibility not to harm protestors invading a work site, we cannot support a wording in the Code which would require the cessation of all work on a site once a single protestor invades or indeed in "<i>preparation for an invasion occurring</i>" as stated in the Code. This is a clear invitation for such invasions as the Code would be a substantial aid to potential protestors, enabling them to quickly and easily obtain their objectives. In our experience, calling on the authorities does not usually result in a rapid resolution of the situation. The Code should only require the minimum cessation of activity congruent with the protestors' safety.</p> <p>As an example, In Western Australia some years ago tree sitting in a coupe resulted in a cessation of all activity in that coupe. This led to a lot of tree sitting, substantial loss of time and money, much frustration and anger and a lot of wasted police time. Once the practice was changed to allow tree felling to continue to within two tree lengths of the protestor, that form of protest was largely discontinued in WA.</p>
6.3 The Felling Operation	This section deals with the felling of trees against their natural lean. The described procedure is inadequate to deal with treejacking a two person procedure involving the use of hydraulic pumps to fell a tree 180° against its lean.
9.1 Section 1. Dot point 7	Establishing oral, visual and compatible radio communication between driver and machine operators is not always practical. We suggest that at least two of these three methods of contact be established between the driver and machine operators.
9.1 Section 1. Dot point 8	It is not practical for a waiting driver to be provided with " <i>adequate shelter and amenities</i> " at a temporary bush landing while waiting to be loaded. We suggest it is the responsibility of the driver to ensure they have their own PPE to shield them against the elements.

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<p>9.1 Section 4</p> <p>Dot point 6</p>	<p>The code specifies the outer logs should be secured by at least 2 lashings. In Western Australia our own code allows for just one restraint on logs less than 2.1 m. It is our belief that low weigh bays of logs 1.8 – 2.1 m do not require 2 lashings.</p>
<p>9.1 Section 5.</p> <p>Dot point 2</p>	<p>We not see a need for handrails and steps on trucks as we do not feel it is appropriate for drivers to climb onto trucks to check their load of logs.</p>
<p>9.1 Section 7</p> <p>Dot point 2</p>	<p>It should be noted that the unloading procedure is variable depending on the nature of the timber being unloaded and therefore the need for mechanical restraint also varies. In broad terms, in Western Australia these procedures vary depending on timber being either;</p> <p>(1) native timber (2) plantation softwood, or (3) plantation hardwood/small diameter debarked logs.</p> <p>(1) For native timber we do not support, as standard practice, the mechanical securing of logs prior to the removal of the bindings. In our own safety code we address this issue in the following way;</p> <p><i>‘The load is to be unloaded in accordance with the enterprise’s approved unloading procedure following a formal risk assessment of the plant to be used in the unloading process to ensure suitability for the task. Safe unloading of timber procedures shall consider...forks against load prior to the release of load binder and chain where the load is above stanchion height or logs are of unequal length’.</i></p> <p>(2) Softwood plantation sawlogs are generally loaded below stanchion height and while bound tightly they are not bound to the point where they bend and are likely to spring up when the bindings are released, for this reason the risk of falling logs is considered to be very low. Often drivers will remove bindings once they arrive at the destination but before they enter the specific unloading area. In our own safety code we again find the wording <i>‘forks against load prior to the release of load binder and chain where the load is above stanchion height or logs are of unequal length’</i> addresses this issue.</p> <p>(3) hardwood plantation logs/small diameter debarked logs are also generally loaded below stanchion height however the possibility of logs springing up or falling are greater than for large native and pine sawlogs, therefore it is common practice for the driver to remove all straps other than the front strap on each bay once arriving at the</p>

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	<p>destination but before entering the specific unloading area. Mechanical securing of the load before removing the last binding on each bay is essential.</p> <p>In all instances it should be stipulated that the truck driver must never walk under the loaders hydraulic arms whether or not they are raised to restrain the load or are in the process of unloading.</p> <p>This requirement for mechanical restraint is repeated in section 9.2 “load securing”.</p>
<p>9.1 Section 7</p> <p>Dot point 5</p>	<p>The requirement for machines used to unload trucks to be specifically designed to lift the load above stanchion height is not always possible depending on the size of the log. There are instances in Western Australia where drop stanchion deliveries are necessary to unload large logs. There needs to be a provision in the code for drop stanchion deliveries and dot point 7 needs to be reworded to allow for this.</p>
<p>9.1</p> <p>Figure 9.1</p>	<p>In line with our general comments submitted above (3. location of the log truck driver when loading and unloading). We would like to see the green section in the diagram (titled: designated safe section for the truck driver to stand) extended beyond the far side of the truck or the opposite side of the truck to the loader, but not within 15 metres of the truck.</p>
<p>9.2</p> <p>Log restraining equipment: Load Configuration</p> <p>Dot point 4</p>	<p>We agree that when dealing with small logs the <i>‘outside logs that are in contact with the stanchion must have no part of that log above the height of the stanchion’</i> however it is acceptable practice in Western Australia to load above stanchion height when dealing with larger logs, particularly native timber. In our own safety code we allow for these logs resting against the stanchion to have up to 50% of the diameter of the log to be loaded above stanchion height.</p> <p>This requirement to load below the stanchion is repeated under section 9.2 – Stanchions.</p>
<p>9.2</p> <p>Chains and Tensioners</p>	<p>Dog style load binders should not be disallowed if used with a proper tensioning bar and used in accordance with the manufactures specifications. The code gives a clear direction to use turnbuckle tensioners however these are not always practical as they can clog with dirt, bark and other debris that make the binder difficult and unsafe to use.</p>

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<p>9.2</p> <p>Jinker trailers</p>	<p>Recommendation to slightly amend wording to read '<i>Where the driver of a vehicle returns <u>to the forest landing</u> with an empty vehicle....'</i></p>
<p>10.1</p> <p>Infield Chipping</p>	<p>There is general consensus that this section is too brief. There is also no mention of loading or unloading procedures for woodchips.</p> <p>Issues to consider when loading woodchips may include but are not limited to; the location of the truck driver, safety issues associated with manually spreading the load and falling from the chip truck. The issue of drivers working at height is a real issue particularly in regards to infield chipping procedures.</p> <p>Unloading of woodchips are generally done by one of three methods, (1) hydraulic self-tippers, (2) walking floor discharge, (3) custom designed truck tipper at the receival facility. There are risks associated with all three processes and these should also be covered in the code.</p>