

OHS Regulations Reform – Public comment submission form			
Note: Areas marked with an asterisk (*) denote required information.			
Type of submission *	Individual <input type="checkbox"/>		Organisation <input checked="" type="checkbox"/>
Organisation name * (where applicable)	Click here to enter text.		
First name *	Name withheld		
Last name *			
Email address *			
Postal address	Click here to enter text.		
Postcode *	Click here to enter text.		
State *	VIC		
Do you consent to WorkSafe publishing your submission?*	<input type="checkbox"/> Yes – WorkSafe may publish my submission with my name		
	<input checked="" type="checkbox"/> Yes – WorkSafe may publish my submission, but please publish without my name		
	<input type="checkbox"/> No – WorkSafe may not publish my submission		
Note: All submissions will be treated as public documents and will be published online unless clearly identified as being confidential.			
Does your submission contain personal information of any third party individual/s?*	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, have you obtained consent from the third party individual/s to include their personal information in your submission?*	<input type="checkbox"/> Yes <input type="checkbox"/> No
Note: If you have not obtained consent from the third party individual/s, WorkSafe may elect not to publish your submission or may redact third party information from your submission.			
I am providing feedback on:	<input checked="" type="checkbox"/> Proposed OHS Regulations 2017 <input type="checkbox"/> Proposed OHS Regulations 2017 <input type="checkbox"/> Regulatory Impact Statement for proposed Occupational Health and Safety Regulations 2017 and Equipment (Public Safety) Regulations 2017		

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Proposed OHS Regulations

Please provide your comments on the proposed OHS Regulations. Where possible, please indicate the part, division and regulation reference in which you are commenting on. General comments are also welcome.

General comments on the proposed OHS Regulations	
<p>If the purpose of the changes are to improve safety and reduce costs associated with safety, without compromising health and safety of workers, in its current form I don't believe this document achieves this. There is still a lot of grey areas around plant that is not in high risk categories yet requires some level of education and is left to be interpreted by the relevant inspector that turns up on your doorstep and makes their own interpretation of the document. The ambiguity around the training requirements and the increase in cost to provide high level training for a lower risk plant has now raised the prospect of making the decision to remove plant from site as it is much too difficult to manage with the current proposal.</p>	
Specific comments on the proposed OHS Regulations	
Chapter 1 – Preliminary	<p>Dogging Definition – currently as the definition stands that any person that makes a sling selection for a vehicle crane under 10 Tonne will need to hold a full dogging license to be able to select the right sling to move an object. Currently this is not the case, we are only required to ensure the operator is skilled in the selection (which does not require a high risk license).</p>
Chapter 2 – General duties and issue resolution	<p>Issuing of construction cards, it now states it must be one from the Authority, will Worksafe plan to allow those persons who have a red card to have this changed over to a Construction card without having to re-undertake training again. Worksafe should offer a waiver time to enable different cards to be swapped over to the standard Construction Card. As per WHS legislation when that was introduced.</p>
Chapter 3 – Physical hazards	<p>Click here to enter text.</p>
Chapter 4 – Hazardous substances and materials	<p>Prior to the release of the proposed OHS Regulations, the feedback from Worksafe is that Victoria will not be implementing the GHS, unless you export chemicals out of Victoria will you be required to be GHS compliance. This change of position means that many organisations may have missed all the opportunities to get their systems right before Australia converts to GHS on January 1 2017. An extension on compliance must be provided to allow employers to get coordinated or remove the legislation that confirms you</p>

	have to be compliant with version 5 or 6 but not one of each.
<i>Chapter 5 – Hazardous industries</i>	Click here to enter text.
<i>Chapter 6 – Licensing and Registration</i>	Click here to enter text.
<i>Chapter 7 – Administrative Matters and Exemptions</i>	Click here to enter text.
<i>Chapter 8 – Saving and Transitional Provisions</i>	Click here to enter text.
<i>Chapter 9 – Consequential amendments</i>	Click here to enter text.
<i>Schedules 1 -19</i>	<p>Schedule 3 – High risk licenses, Part 2 License classes for crane hoise and fork lift.</p> <p>Item 15 Vehicle loading crane operation license does not exclude the use of vehicle loading cranes under 10 Tonne for a high risk license, this would be a significant change to the current legislation for Council and any other small business would have to change to now have all operators with a high risk license to operate vehicle under 10 Tonne. Clarity in this section needs to be clear. I have verified in the WHS vehicle loading Code of Practice and they have not specificaly excluded vehilces with a crane under 10 Tonne capacity.</p>

Proposed EPS Regulations

Please provide your comments on the proposed EPS Regulations. Where possible, please indicate the part, and regulation reference in which you are commenting on. General comments are also welcome.

General comments on the proposed EPS Regulations	
Click here to enter text.	
Specific comments on the proposed EPS Regulations	
<i>Part 1 – Preliminary</i>	Click here to enter text.
<i>Part 2 – Hazard identification</i>	Click here to enter text.
<i>Part 3 – Duties of designers of prescribed equipment</i>	Click here to enter text.
<i>Part 4 – Duties of manufacturers of prescribed equipment</i>	Click here to enter text.
<i>Part 5 – Duties of importers of prescribed equipment</i>	Click here to enter text.
<i>Part 6 – Duties of suppliers and agents of suppliers of prescribed equipment</i>	Click here to enter text.
<i>Part 7 – Duty of person in charge of prescribed equipment</i>	Click here to enter text.
<i>Part 8 – Notice of prescribed equipment design</i>	Click here to enter text.
<i>Part 9 – Incident Notices</i>	Click here to enter text.
<i>Part 10 – Saving and transitional provisions</i>	Click here to enter text.
<i>Schedule – Prescribed equipment designs to be notified</i>	Click here to enter text.

Regulatory Impact Statement for proposed Occupational Health and Safety Regulations 2017 and Equipment (Public Safety) Regulations 2017 (RIS)

Please provide your comments on the Regulatory Impact Statement. Where possible, please indicate the section in which you are commenting on. General comments are also welcome.

General comments on the Regulatory Impact Statement	
Click here to enter text.	
Specific comments on the Regulatory Impact Statement	
<i>Part One – Introduction and general analysis</i>	Click here to enter text.
<i>Part Two – Analysis by hazard area</i>	Click here to enter text.
<i>Part Three – Implementation, evaluation and consultation</i>	Click here to enter text.
<i>Appendixes A to E</i>	Click here to enter text.
<i>Technical Appendix</i>	Click here to enter text.