

Compliance Codes – Public Comment Submission Form			
<i>Note: Areas marked with an asterisk (*) denote required information.</i>			
Type of submission *	Individual <input type="checkbox"/>	Organisation <input checked="" type="checkbox"/>	
Organisation name * (where applicable)	Victorian Automobile Chamber of Commerce		
First name *	Click here to enter text.		
Last name *	Click here to enter text.		
Email address *			
Postal address			
Postcode *			
State *	VIC		
Do you consent to WorkSafe publishing your submission?*	<input checked="" type="checkbox"/> Yes – WorkSafe may publish this submission with my organisation's name/my name.		
	<input type="checkbox"/> Yes – WorkSafe may publish my submission, but please publish without my name.		
	<input type="checkbox"/> No – WorkSafe may not publish my submission due to confidentiality reasons.		
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Does your submission contain personal information of any third party individual/s?*	<input type="checkbox"/> Yes	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 checked="" type="checkbox"/> No		<input type="checkbox"/> No
<i>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>			
Can WorkSafe contact you about your submission?*		<input checked="" type="checkbox"/> Yes	
		<input type="checkbox"/> No	
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About VACC

Since 1918, the Victorian Automobile Chamber of Commerce (VACC) has represented the interest of small and medium businesses in the automotive industry. Currently, its 5,200 members employ approximately 50,000 people and provide key services in the repair, services and retail sectors of the motor industry.

VACC represents some 29 different sectors in the industry. Some of the various divisions in the retail motor industry are mechanical repair, body repair (including spray painting), automotive dealers, used car traders, auto electrical, engine re-conditioners, tyre dealers, radiator services, farm machinery, motorcycle dealers, service stations and convenience stores and towing operators.

VACC provides comprehensive advice and assistance to help members run their businesses more effectively. VACC, on behalf of its members, tenders this submission in response to the proposed compliance codes.

The views expressed in this submission have been developed through a number of avenues:

- VACC's Occupational Health, Safety and Environment Department which have extensive experience in the practical application of Occupational Health and Safety (OHS) legislation, Environmental Protection legislation, Dangerous Goods legislation, and its interaction with industrial instruments and other legislative provisions regulating the employment relationship in the retail motor industry;
- Views of members expressed through day-to-day contact who use VACC's advice, training and consultation services; and
- Discussions with other key stakeholders.

General comments about the proposed compliance codes

Please provide your general comments on the proposed compliance codes in the table below. Where possible, please indicate the part and section of the code you are commenting on.

General comments
<p>The Compliance Codes need to look appealing so employers and employees are more encouraged to access the documents. VACC would like to see more pictures of practical examples throughout the compliance codes as many small and medium business owners are time poor and will not read text heavy documents.</p> <p>VACC supports the new diagram model of the risk management process, as it captures the obligations of the legislation in a simple and understandable format.</p>

Proposed Hazardous Manual Handling Compliance Code

Please provide your comments on the proposed Hazardous Manual Handling Compliance Code. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

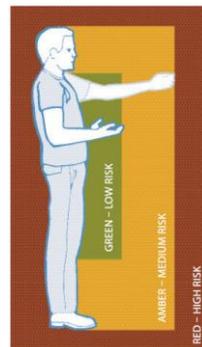
General comments	
Click here to enter text.	
Specific comments	
<i>PART 1 – Introduction</i>	Click here to enter text.
<i>PART 2 – Hazard Identification</i>	
<i>PART 3 – Assessing the Risks</i>	Picture 30- Picture 30 in this part is of poor quality. It is recommended that this picture is updated to be consistent with the other picture quality in the compliance codes.
<i>PART 4 – Risk Control Measures</i>	<p>Determining Risk Control Measures, paragraph 56- VACC recommends that the last sentence should state that employers should contact industry bodies and associations to obtain advice on industry standards and industry specific controls.</p> <p>Working Heights, paragraph 67- This paragraph states, ‘should be performed at hip height and no higher’. In the automotive industry, tasks where considerable muscular effort is used is conducted at different angles. In the example of drilling, it assumes that drilling will be conducted vertically on a workbench. Workbenches in fabrication shops may need to be higher or lower depending on the items size. The reference to ‘and no higher’ gives the impression that it is absolute and a worker cannot work any higher than hip height. It is recommended to remove ‘and no higher’.</p>

Resources and Support, paragraph 90- VACC's opinion is that job rotation should be added to the dot point list.

Tools and equipment, paragraph 93- The first sentence states 'Hand tools should be designed to:'. VACC recommends that 'and selected' is added so the sentence will read as, ' Hand tools should be designed and selected to:' More often an employer will not design tools for employees but they will select and purchase tools and equipment for the job.

Weight Limits, paragraph 101- VACC is in support of this paragraph. Many employers and employees enquire often regarding weight limits. VACC recommends that WorkSafe needs to do a campaign to highlight that there are no prescribed weight limits for manual handling.

Picture 42 and 43- The pictures can be misleading. It is recommended to show the same weight in picture 42 but demonstrate the increase in force (i.e. using a force measurement) from a 60 cm holdout to a 20 cm hold. It is also recommended that WorkSafe implement the traffic light risk scale picture below which has been used successfully in the past in other documents by WorkSafe.



Employers need easier guides when identifying hazardous manual handling. The traffic light risk scale (as seen attached above) has been a very useful tool for training and hazard identification

	purposes in small to medium workplaces.
<i>PART 5 – Review and Revision of Risk Control Measures</i>	How to review risk control measures- VACC recommends that a paragraph should be added to this section that states that employers should conduct risk control review by conducting regular safety inspections. It can further outline that employers should observe manual handling tasks and review the use of manual handling aids.
<i>PART 6 – Designers, Manufacturers and Suppliers</i>	Click here to enter text.

Proposed Hazardous Substances Compliance Code

Please provide your comments on the proposed Hazardous Substances Compliance Code. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

General comments	
Click here to enter text.	
Specific comments	
<i>PART 1 – Introduction</i>	Click here to enter text.
<i>PART 2 – Duties of Manufacturers and Suppliers</i>	Providing an SDS, paragraph 71- The first sentence outlines that a manufacturer or supplier must provide a current SDS on or before the first occasion that the substance is supplied for use at a workplace. VACC Members have requested SDS and are not supplied by the manufacturer or supplier and are often advised to obtain the SDS from the manufacturers website. If WorkSafe Victoria are accepting of the referral to the manufacturer website then it should be stated in the compliance code.
<i>PART 3 – Duties of Employers</i>	Click here to enter text.
<i>PART 3.1 – Hazard Identification</i>	<p>Obtaining safety data sheets, paragraph 87- As mentioned in the above comments, the manufacturer and supplier will often advise employers to access the SDS from the website.</p> <p>Keeping a register- VACC recommends that a simple hazardous substance register template is placed in the appendix and a reference is noted in this section.</p> <p>Labelling- VACC’s opinion is that an example picture a labelling for a decanted chemical container is placed in this section. During VACC OHS audits, small business owners often enquire what should be labelled on the container and how to label it.</p>

	<p>Decanted substances, paragraph 100- VACC has observed at workplaces, and WorkSafe Inspectors have enforced that chemicals should not be decanted into food and drink containers. Employees have ingested chemicals thinking that the drink bottle was their drink and instead it contained chemicals. Furthermore, reactivity of chemicals with food and drink container material needs to be considered and if using old chemical containers, the chemicals could react. A paragraph should be added to this section to outline the hazard of ingesting a chemical or a chemical reaction and to not decant chemicals into food and drink containers.</p> <p>Paragraph 102- VACC often observes worn labelling on decanted chemical containers. It is recommended that the use of other labelling methods can be implemented, for example, key ring tag labels are attached to spray bottles.</p>
<p><i>PART 3.2 – Assessing Risks</i></p>	<p>Paragraph 113- In this paragraph it recommends that if an employer is unsure how to control a risk, then a risk assessment can help. VACC recommends that a simple hazardous substance risk assessment template is provided in the appendix of the compliance code. Also, it is recommended to add to this section that a chemical supplier and the SDS should be reviewed when conducting the risk assessment.</p> <p>Routes of exposure by which a hazardous substance can affect health, paragraph 114 diagram- The diagram of the routes of exposure is missing the injection exposure. It is recommended to number and label the picture and reference them in the text.</p>
<p><i>PART 3.3 – Risk Control</i></p>	<p>Isolation, paragraph 144- VACC recommends that more pictures are shown of risk controls. A useful picture is an example of a positive pressure cabin and demonstrating how it works. It is recommended to number and label the picture and reference them in the text.</p> <p>Engineering controls, paragraph 146- A picture example of local exhaust ventilation, a spray booth and welding process with an extraction should be included in this section. Example pictures can be found in the Safe Work Australia Spray Painting and Welding codes. These type of control diagrams will assist employers in making a choice of control measures.</p> <p>Implementing risk controls, paragraph 157- VACC supports this section as it clearly outlines</p>

	<p>the vehicle spray painting risk controls.</p> <p>Review and revision of risk controls- VACC recommends that a paragraph should be added to this section that states that employers should conduct risk control review by conducting regular safety inspections.</p>
<p><i>PART 3.4 – Atmospheric Monitoring and Health Monitoring</i></p>	<p>When is health monitoring required?, shaded table/list- To assist new employers in determining if their employees are exposed to any of the substances in the list, VACC recommends that example jobs or tasks are assigned to the listed substances. For example, isocyanates for vehicle spray painters, lead in radiator repair.</p>

Proposed Plant Compliance Code

Please provide your comments on the proposed Plant Compliance Code. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

General comments	
Click here to enter text.	
Specific comments	
<i>PART 1 – Introduction</i>	Click here to enter text.
<i>PART 2 – Duties of Designers, Manufacturers and Suppliers</i>	Click here to enter text.
<i>PART 2.1 – Designers</i>	Click here to enter text.
<i>PART 2.2 – Manufacturers</i>	Click here to enter text.
<i>PART 2.3 – Suppliers</i>	<p>Providing Information, paragraph 114- This paragraph mentions the plant being used for scrap materials. VACC recommends that ‘spare parts’ are also referred. Scrap material is more known for metal recycling purposes, however this duty also extends for spare parts. Add ‘and spare parts’ after scrap material in the first sentence and at the end of the paragraph.</p> <p>Provision of information when supplying used plant, paragraph 116- In this paragraph it states that the supplier should inform the person to whom the plant is being supplied. Based on WorkSafe enforcement programs for farm and industrial machinery and general industry plant standards, it is recommended that this paragraph should also recommend that the information and advice is documented. VACC has assisted members who supply second hand plant and the purchaser has ignored the supplier warnings. Suppliers of second hand plant need to protect themselves from litigation by documenting the issues.</p>

	<p>Supply of tractors and roll-over protection- VACC recommends that a paragraph is inserted after paragraph 118 to outline that ROPS should be certified to Australian Standards and should be fitted by a competent person or company.</p>
<i>PART 3 – Duties of Employers</i>	Click here to enter text.
<i>PART 3.1 – Hazard Identification</i>	How to identify hazards, paragraph 139- There is a reference error in the last sentence.
<i>PART 3.2 – Assessing Risks</i>	Click here to enter text.
<i>PART 3.3 – Controlling Risks: General Duty</i>	Click here to enter text.
<i>PART 3.4 – Controlling Risks: Specific Risk Controls</i>	Click here to enter text.
<i>PART 3.5 – Controlling Risks of Specific Types of Plant</i>	<p>Powered mobile plant- It is recommended that pictures and descriptions of the different types of powered mobile plant are inserted in this section to assist employers with identifying the plant that they have. Furthermore, pictures will assist with making the guide more appealing and not text heavy.</p> <p>Controlling the risk of collisions, paragraph 248- VACC has assisted many members with WorkSafe Improvement Notices that request traffic management plan implementation. VACC’s opinion is that WorkSafe Victoria should provide an example template of a traffic management plan in the appendix of this compliance code. Alternatively, WorkSafe should develop a specific guide and tool kit for employers to develop a traffic management plan.</p> <p>Roll-over protection on tractors, paragraph 265- As stated above, it is recommended that this paragraph outlines that ROPS should be certified to Australian Standards and should be fitted by a competent person or company.</p>

<i>PART 3.6 – From Purchase to Disposal</i>	
<i>PART 4 – Plant Design Registration</i>	Click here to enter text.

Proposed Noise Compliance Code

Please provide your comments on the proposed Noise Compliance Code. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

General comments	
Click here to enter text.	
Specific comments	
<i>PART 1 – Introduction</i>	Click here to enter text.
<i>PART 2 – Duties of Designers, Manufacturers, Suppliers and Installers of Plant</i>	Click here to enter text.
<i>PART 3 – Duties of Employers</i>	Noise exposure standard, table 1 and 2- VACC is in support of table 1 and table 2. Small business employers need these tables to obtain a basic understanding of the noise sources and the noise/time exposure.
<i>PART 3.1 – Hazard Identification – Exposure Standard</i>	Click here to enter text.
<i>PART 3.2 – Determining Exposure to Noise</i>	Noise contour maps- VACC would like an example diagram of a noise contour map to be inserted after this section. An example of a noise contour map could help small business owners like small mechanical repairers and body repairers to manage noise problems. Furthermore, a visual tool can be used to educate technicians in a workshop environment. The inclusion of an example diagram will get the attention of the reader.

<i>PART 3.3 – Risk Control</i>	Engineering Controls, paragraph 105- The list of controls in paragraph 105 are good examples of controls, however VACC recommends to show some diagrams of the controls. The compliance code is text heavy and a small to medium business owner is time poor and won't read the code. Diagrams of examples have been proven to obtain the attention of the reader. An example in the automotive industry is an air compressor that has been mounted on rubber padding and the use of refrigerant panelling to make a box to minimise the noise by isolation. The examples in the appendix are good but the diagrams are poor.
<i>PART 3.4 – Audiometric testing and Audiological Examinations</i>	Click here to enter text.