

PUBLIC COMMENT

Consultation on a proposed workplace exposure standard for diesel particulate matter

Instructions

To complete this online submission:

- Download and save this submission document to your computer.
- Use the saved version to enter your responses under each question below.
- Once you have completed your submission, save it and upload it using the link on the Engage submission form.
- You can also upload any other documents needed to support your submission to the Engage submission form.

Submissions will be accepted until **11:59 pm (AEST) on Sunday, 4 June 2023**.

Help

If you are experiencing difficulties making your submission online, please contact us at WESConsult@swa.gov.au.

Respondents may choose how their submission is published on the Safe Work Australia website by choosing from the following options:

- submission published
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Please note the following are unlikely to be published:

- submissions containing defamatory material, and
- submissions containing views or information identifying parties involved in hearings or inquests which are currently in progress.

Your details and background

(Please leave blank if you wish to remain anonymous)

1. Name or organisation

2. Email used to log into Engage

Questionnaire

If you are commenting on particular aspects of the expert report, please identify the particular sections or pages concerned. Your response should, where possible, provide evidence to support your statement.

1. Do you support the proposed workplace exposure standard (WES) for diesel particulate matter (DPM) to protect workers from the adverse health effects of exposure to diesel engine emissions (DEE)?

☐ Yes

☒ No

2. What are your reasons for your response to Question 1? Please provide evidence or information to support your response.

The NSW standards (<https://www.airsafe.net.au/news/new-dust-and-diesel-exposure-standards-for-the-mining-industry/>), WA standards for mining and other reputable sources indicate 0.1 mg (10 micrograms) which is a third less than what SWA is proposing. Further, The EU legislation that came into force 21 February 2023 mandates 0.05mg (5 micrograms) - <https://oshwiki.osha.europa.eu/en/themes/workplace-exposure-dusts-and-aerosols-diesel-exhaust>

3. Is there an alternative WES to DPM as respirable elemental carbon, or additional WES that should be considered to protect workers from DEE? Please provide evidence or information to support your response.

0.05 – 0.1 mg/m³ – refer to sites accessed above.

4. What changes would you need to make in your workplace (over and above any controls currently in place) to ensure workers and others at the workplace are not exposed to levels of DPM above the proposed WES?

a. Please include in your response:

- i. a description of the control measures currently in place at your workplace(s) to minimise exposure of workers and others to DEE.
- ii. details of any costs to implement the WES for DPM (e.g., upgrade of ventilation systems in area X, costing approximately \$XXX).

1. Removing diesel engines and replacing with natural gas or electric ones in bus fleet
 2. Use of electric TRAMS
 3. Use of car fleet that is hybrid or hydrogen powered
 4. Efficient mechanical ventilation in workshops servicing vehicles
 5. Regular maintenance of vehicles
 6. Switching off engines to avoid unnecessary idling. Only turning on engines when ready to move and garage doors open
5. Is there additional evidence or information that you think should be considered?

Refer to references above in Q2

6. Are there any additional comments you would like to make? (free text box with option to upload an attachment)

Reduce the DPM exposure limit further to protect workers.