

4 July 2023

Ms Michelle Baxter
Chief Executive Officer
Safe Work Australia
Email: WESconsult@swa.gov.au


Dear Ms Baxter

Thank you for the opportunity to comment on the proposed workplace exposure standard (WES) for diesel particulate matter (DPM).

The Queensland Resources Council (QRC) is the peak representative organisation of the Queensland resources sector, with a membership that encompasses minerals and energy exploration, production and processing companies, as well as associated service companies. The QRC works on behalf of its members to ensure Queensland's resources are developed profitably and competitively, in a safe, socially responsible and environmentally sustainable way.

The Queensland resources sector is committed to continuous improvement in all areas of work health and safety and follows a best practice, risk-based approach to managing risks of work-related injury and disease.

The QRC works cooperatively with the Minerals Council of Australia (MCA). The QRC contributed to and supports the MCA submission on the proposed workplace exposure standard for diesel particulate matter.

In the Queensland mining industry, there is currently no legislated exposure limit for DPM. However, the industry proactively adopted a risk-based guideline exposure limit for DPM of 0.1mg/m³ (measured as sub-micron elemental carbon) which will be further reduced to 0.05mg/m³ from February 2024. These guideline exposure limits were agreed through a collaborative tripartite process involving resource sector union, industry, and government representation.

The QRC does not support the proposed WES for DPM of 0.015 mg/m³ (measured as sub-micron elemental carbon) and strongly recommends that a Regulatory Impact Assessment (RIA) be undertaken to fully consider the significant impacts of such a proposal on the resources sector. This proposed standard is significantly lower than the guideline exposure limit currently adopted and supported by the Queensland resources sector.

The QRC supports a WES for DPM of 0.05mg/m³ (measured as sub-micron elemental carbon) which may over time be further reduced as the significant technological challenges for the implementation of a lower exposure standard are resolved.

Thank you once again for providing the opportunity for QRC to comment on the proposed standard. The QRC remains committed to working collaboratively with union and government stakeholders to reduce DPM exposures to as low as reasonably achievable and protecting the health and safety of our workforce.

Should you have any queries, please contact [REDACTED]

Yours sincerely

[REDACTED]
Ian Macfarlane
Chief Executive Officer

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