From: [redacted]
Sent: Tuesday, 7 August 2018 10:39 AM
To: 'subscribe@swa.gov.au'
Subject: RE: Consultation RIS now open: Workplace exposure standards in Australia

I would like to comment in the following manner-:

The work that Safe Work Australia has undertaken with this and other processes in order to develop a single item of legislation in Australia is invaluable.

However the adoption by states and territories has been painfully slow, sighting their own agenda etc. as the issue with adoption of some or all the recommendations.

In the case of chemical exposure, we do need a solid frame work that is accepted nationally, however frame works, law and regulation are only as good as the system of management that supports them. I point this comment at both industrial management and that of the regulator, it's unfortunate that we have a low level of compliance at the industrial end and a lack of corrective action at the level of regulator.

The regulator sights lack of funds to enable them to properly police the issues of compliance, I suggest we need a frame work to correct this anomaly. That is instead of fining perpetrators we look at a system of registration relating to businesses that could be linked to an area of regulation and that these business pay a fee, this fee would be the cost of an inspectors visits in order to satisfy the regulator that the systems in place are aligned to meeting the terms of the applicable OH&S laws and regulations.

A few months ago I was on holidays at a local caravan park in [redacted]. This park had a number of permanent residents, one adjacent to my temporary site had a painter cleaning up the old residence ready for painting.
The painter I might add a professional painter according to his vehicles decals, started to atomise chlorine via a high pressure hose and pump, this caused an overspray over myself my wife and caravan. I complained to the painter requesting he stopped that activity, he said why its only bleach?. I requested that he read the MSDS as referred to on the containers he had with him, his response what is that? .

In short I went to the site office complained and requested a refund and left the site. I also reported the issue to [redacted] they advised it was a health issue and not within their jurisdiction. My action from this was to e-mail them as a formal complaint with details about myself and that of the incident with photographs of the event.

I have had no news or information regarding this event to date. But this is not an isolated case, when we look at commercial industry they issue PPE like the proverbial lolly shop. EG-: RPE without training or fit testing, no pre medical and issue PPE that may not be adequate for the job at hand again I make reference to a company involved in welding of exotics, they issued workers with PAPR units, with I might add the correct filters but they had no knowledge of the fact that breakthrough occurs with gas filters. Of course at breakthrough a PAPR pushes contaminant into the users breathing space e.g. in this instance a full facial hood.

Again I am in support of what you are proposing, it's just that all the rules in the world are of little use if people do not understand or do not care about legislation or the adverse impact on employees and end users. Worse still if we do not have a credible system of regulation supporting the cited laws and regulation at the coal face.

I right in the hope that this makes a difference, in favour of a better system

[redacted]