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Consultation representation and participation

My department and other NSW Government departments frequently run fowl of WHS Committee laws and attract Improvement notices. This seems harsh given that we run a complex blend of consultation arrangements that extends well beyond traditional WHS Committees. Our operational range covers 10% of NSW landmass and the cluster employs more than 8000 staff. We have more than 22 WHS Committees, plus HSRs and other tracked consultation activities such as Safety Interactions, collaborative risk assessments, other meetings with safety on the agenda, and so on. Yet we are issued with an Improvement Notice if one of the committees fails to meet within 3 months as specified by Section 78, despite other consultation arrangements continuing unabated. This seems overly prescriptive, because where other agreed WHS consultation mechanisms are in place organisations can essentially do whatever they like. WHS consultation is not necessarily compromised if one far away location misses the 3 monthly meeting window, but continues on with other agreed arrangements. Outside of WHS committees other consultation arrangements are entirely non-prescriptive. If blended, robust and effective WHS consultation arrangements can clearly be demonstrated - why does the law obsess when a WHS committee comes into frame? Why are WHS regulators hard on WHS committees - when they visit and find committees in place without HSR's they press for HSR's to the exclusion of other agreed and lawful consultation mechanisms.