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Submission on Model WHS Act, Regulations and Codes of Practice

I am pleased to have the opportunity to make a brief submission in favour of the adoption by the State of Western Australia of the Model Work Health and Safety Act, Regulations and Codes of Practice. This corpus of legislative material while very lengthy, is modern and conforms with most elements of best practice OHS. My judgement is based, inter alia, on the two years spent as Project Director for the National Mine Safety Framework, that assessed jurisdictional OHS and Model WHS material.

Among many other activities, the three partner bodies comprising WA:ERA, The University of Western Australia, Curtin University and the CSIRO, undertake research, development and education activities in association with minerals and energy companies. Many companies operate across state and territory boundaries and harmonisation of OHS arrangements can increase efficiency and enable a greater focus on health and safety rather than compliance with varying regulatory requirements. This week the Safety Institute of Australia reported that complexity in OHS was a problem for 53% of the 870 businesses surveyed. WA:ERA partner bodies have other joint ventures and collaborative arrangements around Australia for which national Model WHS harmonisation would assist.

Harmonisation based on the Model WHS material would also benefit the WA:ERA joint venture (JV) directly. For example, the CSIRO as a national and international organisation under Commonwealth legislation, is already covered by the Model WHS material. CSIRO is the leaseholder of the Perth-based Australian Resources Research Centre (ARRC) and its science and engineering based tenants are currently required to meet WA OSH requirements, or Commonwealth WHS requirements or both. Both Curtin and UWA have ARRC subleases and must currently meet WA OSH requirements but CSIRO WHS requirements may also apply. This complexity will increase as the \$48.4m National Geosequestration Laboratory announced by the Hon Chris Evans on 27 September 2012 is progressively implemented. NGL assets will be owned by each of the WA:ERA JV partners but the NGL will operate holistically to better practice OHS standards. Sometimes potentially hazardous equipment under different OHS regimes will be co-located. Adoption of the Model WHS package by the State of Western Australia would help simplify this situation and reduce costly duplication.

I would be please to amplify on this brief submission should you wish.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kym Bills', is written over a light blue wavy graphic element.

Kym Bills, FSIA
CEO



Curtin University



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WESTERN AUSTRALIA