

From: [REDACTED]
To: [WorkCover WA New Act Consultation](#)
Subject: Proposed NIHL Changes
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Good Afternoon

I would just like to comment on the proposed changes to the NIHL section of the WA Workers Compensation Scheme. Of particular interest is the proposal that there would no longer be 'baseline' or 'periodic' hearing tests required. Personally, I am at a loss to understand how a percentage of hearing loss can be determined where there is no baseline test to compare it against. I do note that the proposal says that where a determination is to be made in relation to percentage of loss, that previous test results held as well as questioning will help determine this. My problem with this is that this may be fine for people who have been in the system for some time where there are old results but what of people who may only enter the system after the implementation of the proposed changes. As an example, if someone were to move to WA from interstate or overseas and commence work in a noisy workplace, how could any determination be made with no baseline test? An ex-military person or someone from a very noisy workplace could come into the system with severe hearing loss and then in a short period of time claim for the loss. Questioning at the level of Audiologist and ENT specialist would never be perfect if someone really wanted to get their claim approved. As a long term Audiometric Officer in the WA system as well as decades of hearing testing in the armed services prior to that I also find it somewhat interesting that comments can be made about Audiometric Officers results being unsubstantiated at Audiologist test, but those same tests results could be used in any determination of a hearing loss claim. In reality, many of the unsubstantiated results would mainly be due to the Waugh and Macrae Guidelines that are a very small window in any case. As an example Waugh and Macrae Standard 1. An Audiometric Officers result may be 25 Db at 1000Hz which requires referral for further testing, and then the Audiologist result is 20 Db at that same level (normal). I would have thought that a 5 Db difference could be due to nothing more than different equipment and headphones as much as poor technique. Hopefully this short summation of my thoughts will be of use.

Kind regards,

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