

Unit 4 / 29 Enterprise Crescent
Malaga WA 6090
Phone: (08) 9249 2907
Email: tim@precision-acoustics.com.au



Audiometric Equipment Specialists

13th December, 2023

Manager Policy and Legislative Services
2 Bedbrook Place
SHENTON PARK WA 6008
consultation@workcover.wa.gov.au

RE: Modernising WA's Workers Compensation Laws – Implementation Consultation Paper 20

I am writing to submit concerns related to the proposed amendment to regulations and implementation requirements associated with the practice and procedure for the testing of hearing loss and assessment of occupational noise induced hearing loss (NIHL) in workers.

Of particular concern is the proposal to remove the need for baseline testing. Consultation Paper 20 states *“Most other jurisdictions treat NIHL similar to any other workplace injury and simply require the worker to prove their hearing loss was a result of the nature of their employment.”* Unlike other workplace injuries that result in immediate pain or impairment, NIHL is often insidious therefore commonly goes unnoticed and is even ignored. Due to this, it is unlikely a worker will initiate a request for an audiological test as proposed.

Baseline testing serves a crucial role in educating workers regarding the risks of NIHL, the ongoing importance of protecting hearing, and aids in early detection of NIHL. Baseline testing establishes a worker's true hearing status before starting their employment then in the occurrence of NIHL helps identify the timing, source, and type of hearing loss. This may also assist in limiting employer liability for hearing loss claims.

The statistics presented in Consultation Paper 20 indicate that the current testing regime, including baseline and subsequent testing, has been effective. While eliminating baseline testing might reduce costs and the number of NIHL-related claims, this reduction could be due to a lack of education on the topic and consequently unreported or untested NIHL cases, rather than improved care for employees.

It's essential to recognize that the cost of NIHL goes beyond financial figures mentioned in Proposal 20. The impact extends to an individual's effective communication, social engagement, and mental health. Hearing loss can lead to social isolation, loneliness, increased anxiety, and depression among affected individuals.

Consultation Paper 20 highlights the uniqueness of the current baseline and subsequent audiometric testing in Western Australia. Notably, following an extensive period of public consultation NSW Safework are now introducing baseline Hearing tests starting from January 2024, highlighting the importance and effectiveness of such testing measures.

In light of these considerations, I urge WorkCover WA to reconsider the proposed amendments to the worker's compensation laws, particularly regarding baseline testing, to ensure the continued protection and well-being of workers in Western Australia.

Yours faithfully

Timothy Ebrall
Noise Assessor