

Audiometric Equipment Specialists

I am writing in response to **Point 20 Implementation Consultation – Noise Induced Hearing Loss** showing my concerns regarding the negative aspects that may occur with the removal of a requirement for Baseline Audiometric Testing

The Current baseline and subsequent audiometric testing regime that Western Australia currently has in place sets the correct example of the quality of testing that other Jurisdictions should be following.

Work Cover WA should not be proposing to take such a large step backwards by removing the requirement for Baseline Audiometric Testing. Rather other Jurisdictions should be encouraged to increase their quality of care by implementing what Work Cover WA already has in place.

While Work Cover WA is proposing to lower its quality of testing by removing mandatory Baseline Audiometric Testing, it is noted that New South Wales has recently raised its quality of testing by implementing Base Line Hearing Tests and follow up tests (Clause 58 – Audiometric Testing) starting January 2024.

It would be expected that other Jurisdiction will also follow suit by increasing their quality of care in the future as Mandatory Baseline Testing is an important factor for the accuracy of compensation claims and the reduction of Injury from Noise Induced Hearing Loss. Some examples of the importance of Baseline Hearing Tests are:

Baseline hearing tests provides a clear starting point for an individual's hearing health. It establishes a reference against which future hearing tests can be compared.

It helps identify any existing hearing issues or abnormalities that may not be immediately noticeable to the individual.

By establishing a baseline, any changes in hearing can be detected early. Regular follow-up tests can help identify gradual or sudden changes in hearing sensitivity, allowing for timely intervention.

Early detection of hearing loss provides an opportunity for prompt medical or audiologic intervention, potentially preventing further deterioration.

In occupational settings where employees are exposed to loud noises, baseline hearing tests are essential. They help assess the impact of occupational noise on an individual's hearing health.

Regular monitoring ensures that any adverse effects from noise exposure are identified early, allowing for the implementation of appropriate preventive measures.

Baseline hearing tests are foundational to effective hearing conservation programs in workplaces. They help employers tailor interventions and protective measures based on the specific needs of their employees.

Baseline hearing tests promote individual awareness about hearing health. Knowing one's baseline can motivate individuals to take proactive steps to protect their hearing, such as using ear protection in noisy environments or seeking medical advice if changes occur.

It is noted in the Implementation Consultation – Noise Induced Hearing Loss Proposal that 146 made successful claims for NIHL. This statement means that the current baseline and hearing regime is working. The current system has helped identify West Australian Workers who generally would not have been identified and who would likely not be identified if the proposed changes are implemented.

It would be expected that the removal of the current Baseline and Subsequent Audiometric testing regime will create many issues, one grave concern being where Noise Induced Hearing Loss Injury will become much less identified which in turn brings about a lower quality of life for West Australian Workers.

It will also increase the misconception that Noise Induces Hearing Loss is no longer important as the current example set by Work Cover WA will be diminished. This will result in an increased number of workers having and sustaining an injury that could have been identified and more importantly avoided.

Mandatory Baseline Hearing Tests help to educate and remind employees and employers that the protection of hearing is an extremely important factor in the Workplace. The proposal to remove the requirement for Baseline Hearing Tests sends out the wrong message and is a negative approach.

Noise induced hearing loss is cumulative across time, it is farfetched to believe that workers will be able to identify this injury within themselves. It will also bring about the complex issues of how employees, employers, and Audiologist would be able to identify where, when, and how the Noise Induced Hearing Loss has taken place without a Baseline Audiometric Test Result to refer to.

The proposal suggests that false positives under the current regime cause unnecessary expense to employees and stress and confusion to workers. It would be expected that the removal of the current baseline and hearing regime will only increase these factors.

The removal of baseline hearing tests will result in more confusion, frustration, revenge claims plus incorrect claims where workers who have previously sustained a Noise Induced Hearing Loss are now seeking compensation incorrectly or from an innocent employer. The removal of Baseline Audiometric Testing opens the way for incorrect claims and offers no protection for employers who have been innocently accused to refer to.

The proposal set forth will also have a detrimental impact on Jobs and employment in Western Australia. These changes will negatively affect West Australian Businesses, Audiometric Officers and all those associated with the current requirements for Baseline Audiometric Testing. If Work Cover brings about these changes, they may be held to blame for Job losses of many who rely on the current requirements for Baseline Testing.

Noise Induced Hearing Loss is not an unimportant factor where we should be looking to lower our current standards, this is a real injury. Work Cover should keep in place its current practice and only ever look to improve on these standards. This proposal does not do this, the proposal only looks to diminish and dilute an important standard of care plus negatively impact a whole industry, which includes the livelihood of many West Australian's.

It is my hope that Work Cover WA removes the proposal and keeps its current practice of mandatory baseline testing.

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