



Audiometric Equipment Specialists

RE: PROPOSED CHANGES TO WORKERS COMPENSATION & INJURY MANAGEMENT ACT 1981

To whom it may concern.

I am writing to express my concern about the proposal to remove the Audiometric Baseline Testing requirements from the WorkCover Act.

My background is firmly involved with the field of hearing loss and processes around the management of these. I have over 35 years working with NAL and Australian Hearing as well as a further 21 years running my own calibration and audiometric equipment service. I feel this makes me well qualified to comment on this proposal. I was involved with the WorkCover working party in the early days of this program being instituted and have seen the development and changes over time.

There have been many positives from this process, the most notable to do with the raising of standards in the audiometric testing business. As there were developed and monitored procedures for all aspects of the testing process, it resulted in a better quality of assessment and a raising of calibration standards. This is in stark contrast to other States in Australia who lacked this structure. This is particularly so in regards to those claiming to offer equipment calibrations. The lack of a monitored process allows for anyone to offer this service and it is clearly evident from our experiences, that few know how to do this correctly. This reduces the overall quality of work done in this area. By removing the regulation, it will result in a general dropping of standards and subsequent increase of errors in the testing process. It is a backward step that is proposed by WorkCover and I strongly object to this change.

There are many businesses in Western Australia who have invested considerable resources into the WorkCover testing program and this change will severely reduce their return on this investment. It is claimed that the change will make savings but I contend that any savings will be offset by the subsequent losses among those currently providing this service. Again, a backward step.

It can also be argued that having Audiologists determine the level of Noise Induced hearing loss resulting from work related exposure is not much better than guesswork. If they do not have the baseline to reference then this is a large ask. Their testing will only indicate the extent of a hearing loss but not where it came from. Also apportioning the hearing loss if suffered based purely on time at each employer is an unbalanced method. If for instance, an employee works for a period at a workplace with no high noise levels, or where the employer does the right thing to protect their workers, they could be unfairly apportioned for part of the loss even though they did not contribute to it.

Our experience with the majority of ENTs is that their expertise is not focused on this area and generally although with some exceptions, they are the least likely to maintain a regular calibration program of the audiometric equipment they use.

As Noise Induced Hearing Loss is a long-term problem that develops over time with only minor warning signs, the likelihood of workers noticing such a loss and requesting testing is very low. The WorkCover program was set up as a protection for all who may be exposed to high noise levels. With the changes being proposed, this protection will no longer be there. Without a clearly defined demonstratable loss over time, claims will be difficult to substantiate and result in disputes or loss of deserved compensation. This is of no benefit to a claimant.

Audiologists generally are involved in others areas of their skill set and may not be willing or available to take on these assessments.

I would also like to comment on the timing of this comment period. It was put forward at a time of the year when most are on leave or following other end of year activities. This has limited the time for a full understanding to be gained and may skew the input received even if they are aware of the proposal.

The standards listed in Appendix 3 do need to be reviewed. No reference is made to the ISO389 series and AS/ISO 8253. These are current for audiological testing methods and conditions as well as giving the offsets for calibration purposes. This review should be separate from this proposal and involve those in the industry who are across the standards applicable.

It is also odd that WorkCover in Western Australia are proposing dropping baseline testing, when this is being introduced in other States.

I would like to raise a point in regards to the noted differences between Baseline tests and those conducted by an audiologist. There may be differences but the cause needs to be looked at. There is a problem in the initial process that was setup for testing under the Act. Despite it being stated in the Australian Standards that the use of Noise Excluding Headsets will introduce errors and they should not be used for compensation purposes, this was still allowed. Subsequent tests by an audiologist have to be performed using equipment approved for full audios only. These are not approved if they use enclosures. This has resulted in these errors being present mainly due to WorkCover allowing the use of these enclosures and not due to the testers methods. The reasoning used to allow this was to reduce the cost to industry in complying. A similar rationale as being proposed here!

I trust that you will give consideration to these comments and feedback where appropriate.

Sincerely,
Ian Wheeler
Owner/Director
Precision Acoustics.



12/01/2024