

From: [REDACTED]
To: [WorkCover WA New Act Consultation](#)
Subject: Implementation Consultation Paper 20: Noise Induced Hearing Loss
Date: Wednesday, 29 November 2023 7:08:03 AM

[External] - Please be cautious when opening any links or attachments if the sender is not known

To whom it may concern.

After reading the proposed regulations and implementation requirements associated with NIHL ACT, I was deeply frustrated and disappointed that this is the path that WorkCover wish to choose moving forward.

For nearly 18 years I have been an approved WorkCover Audiometric Officer and Noise Officer, operating out of a mobile clinic with an WorkCover approved Booth and Audiometer.

I have been servicing the whole of WA in that time frame. I felt proud that we were offering a service that was regulated by WorkCover in monitoring workers hearing and assisting in reducing NIHL by

1. Determining if a workplace was a WorkCover prescribed workplace by conducting a noise survey and identifying the noise hazards and the workers exposed to the noise hazards. Identifying a workplace as prescribed workplace under the current ACT would in return action employers to have their noise exposed workforce to have their baseline hearing tested done within a time frame. Workers in a prescribed workplace could pursue an audiometric test yearly. Removing this from the ACT will reduce companies to action noise surveys to determine if they are a prescribed workplace and if they need to test workers resulting in less actions to reduce noise hazards and placing workers in more harm's way.
2. Presently its regulated to conduct baseline hearing tests for these workers and upload them into the WorkCover data base. This process of a baseline identifies ones hearing position, something WorkCover monitored and managed well, a system that lets us compare results and triggers a 10% loss for further investigation. Companies would action us to conduct the baseline and then setup annual and biannual hearing conservation programs so that results could be monitored, and any early loss identified by conducting annual and biannual testing would action the employer and employee to prevent any further hearing loss programs. Conducting the baseline and then ongoing testing programs assisted in less hearing loss reaching that 10% which triggers the NIHL claim. 90% of companies would have us enter the results into the WorkCover database for the workers to know that they are covered in the event of 10% NIHL. Workers themselves welcomed this system and are very interested in seeing and comparing their results from previous tests.
Removing this system will not only reduce employers to reduce hearing conservation programs but to have this now be the workers responsibility to request hearing testing really is a backward step in care for the blue-collar workforces, we know that it's proven through time without training, guidance and reminding they don't take preventative care of themselves.
We know that workplace hearing injuries are a gradual usually painless injury so once again I say, asking individuals to follow the process of sorting a test for themselves is

unrealistic and will result in a massive reduction of knowledge and understanding related to hearing conservation and results.

3. As it stands a worker is to have a baseline hearing test conducted in a time frame and entered the WorkCover data base. Why destroy a flawless system that gives a worker and employer knowledge of where their hearing is at and something to compare annually/biannually. This also creates a historical trace of their hearing and whom they worked for, if a compensation claim is to take place. If a worker has worked for 5 companies over 10 year and then decide to request for a hearing test how will an Audiologist determine a hearing loss is caused due to a particular workplace without a baseline to compare with. Impossible, factual evidence is more effective than guess work.
4. Being part of WorkCover and all they stand for in protecting the workers from NIHL, I thought we were the state well ahead of other states. So why are we now going backwards in removing the need to conduct baseline audiometric testing when other states such as NSW now implementing baseline audiometric testing. It makes sense to know where workers are at when they start their journey in the workplace. It makes more sense to have a data base that monitor these results for us to guide employers and the workforce in reducing noise and preventing hearing loss. It makes sense in having a regulatory service that monitors the process of the audiometric officers and the use of approved booths and equipment to keep everything in uniform.

It makes no sense in implementing the proposed regulation changes. A backward step for WA and noise effected workers.

Kind regards

Matt

Matt Instance

WHS Advisor | Work Health Professionals

Onsite Health and Safety Services