

Final report summary

PRJ-010828: Export Fodder Workplace Safety Standards

This project was designed to assess workplace health and safety (WHS) problems and issues within the Australian export fodder processing industry with a focus on identifying key areas of Workplace Health and Safety (WHS) risk and the development of strategies to alleviate/mitigate these risks.

Objectives

1. A full and comprehensive risk assessment of potential WHS problems and issues within the Australian export fodder processing industry.
2. The development of strategies to alleviate/mitigate these risks with a clear pathway of resolution for each problem/issue proposed.
3. Preliminary indications of the resources (i.e. time, people, costs) to implement the recommended resolution for each problem/issue.
4. An audit of all Australian export fodder processing plants to indicate the level of severity of each WHS problem and issue identified (pre and post implementation).

In Summary

Between September 2018 and February 2019, 21 export fodder facilities (AFIA members) were visited by Tricia Chant, to determine how the facilities were operating and whether there were any areas that were not meeting current work health and safety legislation.

Individual reports were prepared for each site and provided to the 'persons conducting a business or undertaking' (PCBU) or their delegate. The reports detailed the findings, and also provided brief information on what was required in order for the company to rectify any findings. The specific findings of the individual audits have been summarised within this report, however any identifying detail has been purposely removed.

A Confidentiality Agreement was provided to each site that was signed by the PCBU (or their delegate), and the auditor. A copy of the signed Agreement is held by each party.

The individual facilities were ordered against the appropriate legislation, including:

- Work Health and Safety Act 2012 – South Australia
- Work Health and Safety Regulations 2012 – South Australia
- Work Health and Safety Act 2011 – New South Wales
- Work Health and Safety Regulations 2017 – New South Wales
- Occupational Health and Safety Act 2004 – Victoria
- Occupational Health and Safety Regulations 2017 – Victoria
- Occupational Health and Safety Act 1984 – Western Australia
- Occupational Health and Safety Regulations 1996 – Western Australia.



Outcomes

A total of 21 sites were audited during the project with 193 findings found across the sites, resulting in an average of just over nine per site (9.19). The lowest number of findings at one particular site was three, and the highest was 16.

The findings included:

- Deficiencies – 59
- Improvements – 80
- Recommendations – 54

Findings

Responses

Procedural	10
Risk management	12
Training/competency	20
Emergency planning	36
Chemical/hazardous goods	18
Electrical test and tag	10
Communication/consultation	14
Confined spaces	7
Noise assessment	13
Plant risk assessment	27
Incident management	6
Other	20
Total findings	193

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Table 1. Suggested remediation for findings

Findings	Suggested Remediation
Procedural	All facilities should review their procedures to ensure that they are: concise; effective; current; formalised; adequately cover critical safety processes. They then need to ensure that these are communicated to staff, and all staff have an awareness. As Standard Operating Procedures (SOPs) replace other methods of risk assessment in the majority of the facilities, these SOPs must adequately identify and document the hazards of the workplace, the risk/s produced by these hazards, and their method of control.
Risk Management	As Standard Operating Procedures (SOPs) replace other methods of risk assessment in the majority of the facilities, these SOPs must therefore adequately identify and document the hazards of the workplace, the risk/s produced by these hazards, and their method of control. Legislation requires that that all identified high risk areas are documented as a risk assessment (or SOP as an alternative).
Training/ Competency	Legislation requires that that PCBUs confirm qualifications of their personnel (particularly for high risk work) – it is not good enough to just confirm with the worker that they have it. All facilities need to have in place an effective method for ensuring that their workers have the required licences, and that these are in date.
Emergency Planning	Legislation requires that potential emergencies to be identified, and procedures put in place as appropriate. All facilities should review their emergency procedures to ensure that they adequately address these.
Chemical/ Hazardous Goods	It is a requirement of legislation that Safety Data Sheets are made available for hazardous goods used at the facilities – they must be in an area that is easily accessible by all staff. Facilities should review their SDSs to ensure that they cover all hazardous goods kept on site; are available to all staff; and are in date (Codes of Practice require manufacturers to update SDS's every five years).
Electrical Test and Tag	Legislation requires that electrical equipment is checked and tested regularly, and tagged. Each state differs on the requirements for different types of equipment and each facility should ensure their equipment is tagged in accordance with the requirements.
Communication/ Consultation	It is a requirement of OHS legislation that PCBU's consult with their workers. The legislation does not require this to be recorded, however it is highly recommended that it is, for future reference.
Confined Spaces	All facilities should refer to AS/NZS 2865 Confined Spaces to determine whether spaces inside the plant should be deemed a confined space. Should areas be identified as confined spaces, then the facility must ensure that adequate risk assessments, procedures and training is in place.
Noise Assessment	If noise is identified as a high risk area to workers, then a noise assessment must be completed according to OHS regulations. The regulations do not stipulate which industries must conduct noise assessments, it is up to the PCBU to determine if it is needed or not. With the plant and machinery operating at all facilities, it is strongly recommended assessments are carried out by external, competent personnel. The recommendations identified by the assessment should be implemented.
Plant Risk Assessment	This is a very high risk area for all facilities. For those that have not undertaken a risk assessment, this must be done, and by competent personnel. Results of those risk assessments (such as guarding required) must be implemented. Better housekeeping and safety culture must be implemented in those facilities that are currently lacking with keeping fencing/panelling in place.
Incident Management	The legislation requires PCBUs to document incidents and ensure actions are put in place to try and prevent the same or similar from occurring again. After an incident the facility's risk assessment/safe operating procedure relating to that area should be reviewed. It is recommended that all facilities review their incident management procedures.

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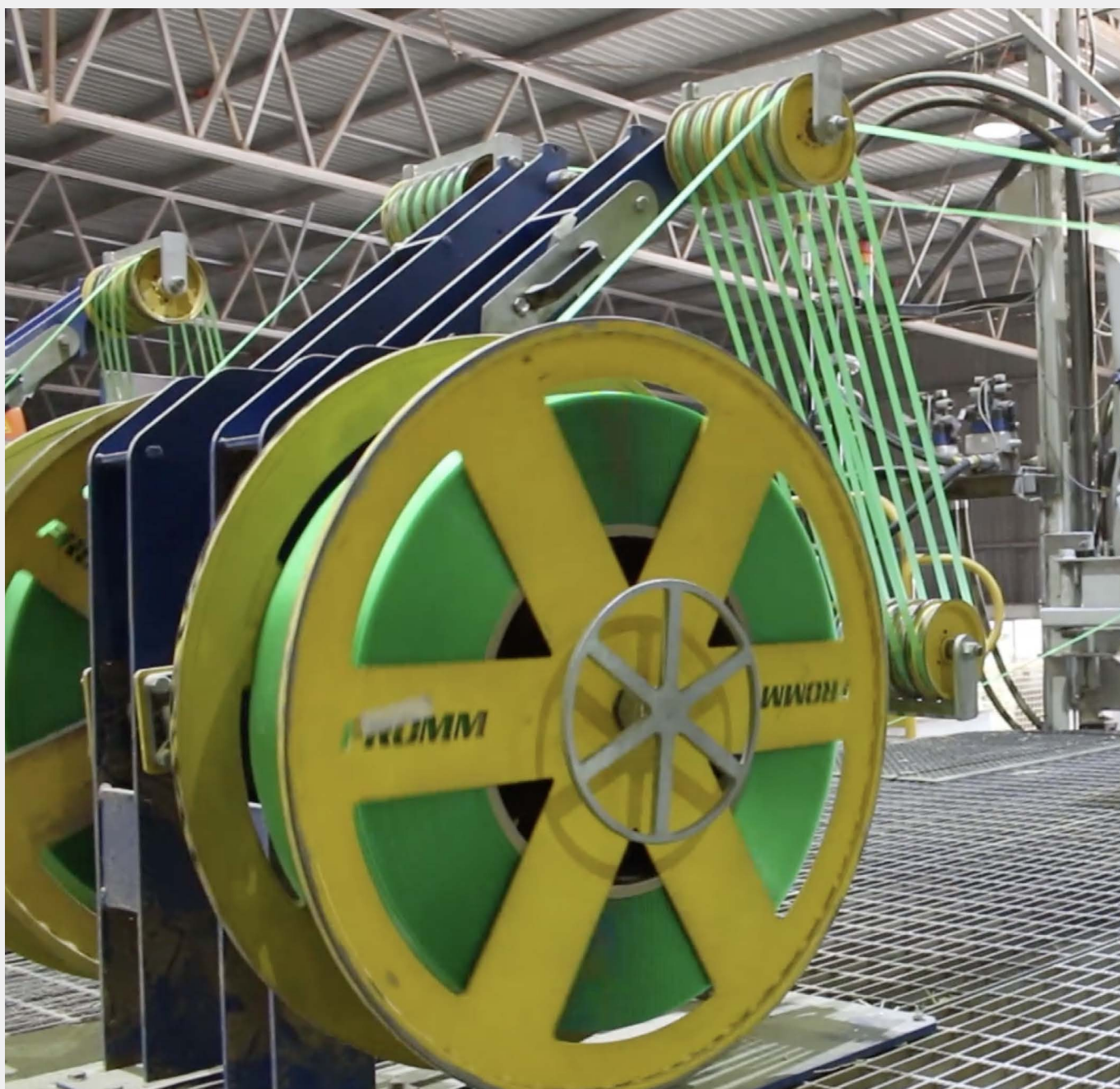
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Implications for the export fodder industry

It is recommended that each site reviews their individual reports and addresses the findings made. If there are any areas that are not clearly understood, or if there is further guidance or assistance sought, the individual companies are invited to contact the auditor directly.

Verbal responses to the project have been very positive. All facilities audited acknowledged the benefits of the project, including providing an opportunity to all members to assist in identifying any areas of deficiency and improvement, and allowing them to address these. Knowing that the individual site findings were not going to be made available publicly provided the company with confidence that they would not be in any way disadvantaged by the process.

As a follow up, the auditor will contact each audited facility (by email) to determine if and how the findings of the audits are being addressed, and whether or not any further assistance may be required. Additionally, formal feedback on the project will be sought.



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