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Policy No. 5

Occupational Health & Safety

DOCUMENT CONTROL

Version:	15 th September 2014 Wilda Kerr
Date approved by Board:	23 rd October 2014
On behalf of Board:	Denis Moroney President
Next review date:	October 2017

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TITLE

Occupational Health & Safety

PURPOSE

The SSAA Vic recognises its moral and legal responsibilities to provide a safe and healthy workplace that does not place its employees, contractors, visitors or the general public at risk of injury, illness or property damage.

SCOPE

State Office / ranges / branches / sub clubs

OBJECTIVE

Provide direction

POLICY DETAILS

The SSAA Vic will aim to prevent work-related incidents by:

- Providing safe equipment and systems of work;
- Ensuring compliance with legislative requirements and industry standards;
- Providing appropriate information, instruction, training and supervision to staff members, contractors and visitors to ensure their safety;
- Provide support and assistance to staff and members.

Responsibilities:

The key rules, which underpin this policy are that everyone:

- Understands their accountability for health and safety;
- Identifies and managed hazards within their area of responsibility;
- Is provided with health and safety information, and necessary instruction and training that they need to perform safely and without harm to others;
- Participates in health and safety management plans and activities;
- Accepts their "Duty of Care" and follows all safety policies and procedures;
- Reports work related incidents and causes so that the issue can be investigated to ensure future prevention.

1.0 DANGEROUS GOODS

Dangerous Goods are goods that present an immediate threat to safety & health, such as explosion, fire, radiation, infection or corrosion. Examples of Dangerous Goods which may be used include LPG, Aerosol cans, compressed air, petrol and wet cell batteries.

Dangerous Goods are classified into 9 major categories according to the immediate type of threat they present:

Class 1	Explosives
Class 2	Gases
Class 3	Flammable Liquids
Class 4	Flammable solids
Class 5	Oxidising Substances
Class 6	Toxic and Infectious Substances
Class 7	Radioactive Substances
Class 8	Corrosives
Class 9	Miscellaneous Dangerous Goods

1.1 *Dangerous Goods usually carry distinctive warning signs*

There are stringent transport, licensing, storage and handling regulatory requirements placed upon Dangerous Goods.

The SSAA Vic aims to keep the use of dangerous goods to a practical minimum. This approach minimises the risks to staff, contractors and visitors.

1.2 *Dangerous Goods Storage*

Storage requirements for dangerous goods are based on the total amount of material stored at a site. As the amount increases the requirements become more stringent.

Sites with minor holdings below the prescribed minimum can generally comply provided Duty and Care obligations have been met through the application of Hazard Management principles.

1.3 *Dangerous Goods Storage in Offices*

Office buildings that store dangerous goods are subject to the same dangerous goods storage legislation as other properties. Onus for compliance is on the occupier, not the owner of the property.

1.4 *Dangerous Goods Transport*

The transport of dangerous goods is regulated under the Australian Code for the Transport of Dangerous Goods by Road and Rail.

Many activities performed by SSAA Vic staff and members require the use and hence transport of dangerous goods. For example petrol and diesel for portable generators, wet cell batteries to power equipment, etc.

The SSAA Vic must ensure that staff and members who transport these materials are provided with the necessary training, tools and equipment to enable them to transport the goods safely.

1.5 Implementing Dangerous Goods Storage

Dangerous Goods storage compliance is usually done as part of an overall chemical rationalisation. The assessment of compliance requirements is based on information from an inventory of chemicals and the corresponding Material Safety Data Sheet (MSDS). The MSDS identifies which chemicals are dangerous goods and the inventory provides information on the location and current quantity of each dangerous good. This information is then used to determine more specific requirements under the various State dangerous goods storage laws.

After rationalising your chemicals, use an implementation checklist to identify and assess what else is needed to be done. When holdings are kept below certain levels, compliance is usually a matter of providing appropriate segregation and managing the chemicals. If you have significant holdings of dangerous goods, you may need a consultant to assess requirements.

General requirements of Dangerous Goods storage laws

The specific requirements of State and Territory dangerous goods laws vary from State to State, but the general underlying principles are similar. These principles are as follows:

- Distinction between 'minor' and 'major' storage
Most States and Territories generally have less stringent requirements for storing quantities which are considered 'minor' to those which are considered 'major'. In most cases minor storage is classified as an aggregate quantity of dangerous goods below 1000 litres/kg.
- Storage of packaged dangerous goods
Each dangerous good class has specific storage requirements which must be met. Typical storage requirements include the type of room/building to be used, spillage containment, lighting, ventilation and how the goods are to be kept whilst in storage.
- Storage of bulk dangerous goods
Typical requirements include the location of bulk stores, spill containment and ventilation.
- Separation of stores
This generally includes how far apart stores containing dangerous goods are to be located and the distances required from surrounding premises, etc

- Segregation of dangerous goods
Segregation specifies the distances, or the separation means to be applied to dangerous goods which must not be stored together.

1.6 Signage

Requirements include the signage (placarding) of dangerous goods storage areas and bulk containers. This requirement usually applies to storage considered 'major'.

1.7 Emergency management

This includes the need to plan for emergencies and provide emergency information such as Emergency Services Manifests (ESM) to emergency services.

1.8 Fire and environment protection

This includes the provision and maintenance of fire protection systems where dangerous goods are stored, including sprinkler systems, fire hose reels and portable fire extinguishers. Also includes environmental considerations.

2.0 DUTY OF CARE (WORK COVER)

Duty of care requires everything 'reasonably practicable' to be done to protect the health and safety of others at the workplace. This duty is placed on:

- all employers;
- their employees; and
- any others who have an influence on the hazards in a workplace.

The latter includes contractors and those who design, manufacture, import, supply or install plant, equipment or materials used in the workplace.

'Reasonably practicable' means that the requirements of the law vary with the degree of risk in a particular activity or environment which must be balanced against the time, trouble and cost of taking measures to control the risk. It allows the duty holder to choose the most efficient means for controlling a particular risk from the range of feasible possibilities preferably in accordance with the 'hierarchy of control'.

This qualification allows those responsible to meet their duty of care at the lowest cost. It also requires changes in technology and knowledge to be incorporated but only as and when it is efficient to do so. The duty holder must show that it was not reasonably practicable to do more than what was done or that they have taken 'reasonable precautions and exercised due diligence'.

Specific rights and duties logically flow from the duty of care. These include:

- provision and maintenance of safe plant and systems of work;
- safe systems of work in connection with plant and substances;
- a safe working environment and adequate welfare facilities;
- information and instruction on workplace hazards and supervision of employees in safe work;
- monitoring the health of their employees and related records keeping;
- employment of qualified persons to provide health and safety advice;
- nomination of a senior employer representative; and
- monitoring conditions at any workplace under their control and management.

These are representative of the employer's specific duties in all Australian States and Territories.

The 'hierarchy of control' refers to the range of feasible options for managing the risk to health and safety. The hierarchy normally ranges over the following controls: elimination of the hazard; its substitution with a less harmful version; its redesign; engineering controls; isolation of the hazard from people at the workplace; safe work practices; redesigning work systems; and the use of personal protective equipment by people at the workplace.

3.0 LEAD

The greatest risks from exposure to lead are from exposure to lead "fume" the ultra fine particles formed from condensing lead vapour. This occurs when lead is melted either to cast or when a lead bullet is exposed to the heat of burning propellant. The next greatest risk is handling the finely divided lead powder that forms when a lead projectile impacts on a hard surface – falling plate or steel backstop. Lead can also collect on the hands from targets and other range furniture and be swallowed during eating or smoking.

The responsibility of SSAA (Vic) extends only to those activities that take place on properties, including Ranges, managed by that body.

On an open Range lead concentrations are unlikely to reach a level that represents any health hazard. On enclosed and semi-enclosed Ranges however lead levels can reach and exceed workplace safety levels and pose a risk to health. Although the *Occupational Health and Safety (Lead) Regulations 2000* are largely applicable to employees in workplaces there is a general duty of care provision under section 22 of the Occupational Health and Safety Act 1985 which is applicable to anyone who could be adversely affected by any process.

It is understood that some persons or groups may not agree with a policy for the management of lead. However, to meet its duty of care to the members of the Association and the public, the Board of SSAA Vic should implement the following policies on all accredited Ranges. Although pistol and muzzle-loader shooters are the groups most exposed to lead, these policies must apply to all forms of shooting:

1. Washing facilities should be available at all times when the Range is in use. These washing facilities should be located as close as reasonably possible to areas where lead projectiles are routinely handled.
2. Warning signs should be posted advising persons handling lead projectiles (eg. muzzle-loaders, “western action”, and pistol-shooters) to wash their hands after leaving the firing line. The warning signs should also caution against eating or smoking while handling lead projectiles.
3. All Range Management Committees must enact rules prohibiting the collection and removal of discharged, lead projectiles from all SSAA Vic Ranges.
4. Lead (other than intact, undischarged projectiles) is only to be removed from SSAA Vic Ranges with the express, written permission of the Board. Such permission will only be given after the Board has satisfied itself that the person(s) concerned will comply with the provisions of the Lead Regulations and Code of Practice.
5. On enclosed Ranges and Ranges with barriers and roofs interfering with air circulation shooting should be restricted to jacketed projectiles where possible. Lead projectiles should only be used where absolutely necessary (eg. for use against steel plate targets at less than 10 metres range). (*This is absolutely consistent with the principles of occupational health and safety, which advocate the substitution of less hazardous material or a less hazardous form of material over other methods of protection.*)
6. The use of hard materials as targets or backing plates should be minimised on enclosed Ranges, in order to reduce the amount of finely powdered lead from the break up of jacketed and unjacketed projectiles. (*To this end SSAA Vic should undertake a study to assess the most suitable materials and structures for use as bullet traps. e.g. the “snail” trap.*)
7. Maintenance of SSAA Vic Ranges shall be conducted in such a way as to minimise disturbance of lead, by:
 - wet cleaning of hard surfaces using ‘sugar soap’ (tri-sodium phosphate) which combines with lead to form an insoluble complex;
 - incorporating finely divided lead into earth surfaces (restricting exposures);
 - using low permeability surface coverings (eg. rubber matting not carpet) which will not build up lead over time and are easily cleaned;
 - ensuring that earth surfaces have a thick continuous vegetative cover.

8. Where the problems of lead on enclosed Ranges cannot be dealt with by substitution of projectile or backing material then Range Management Committees will be required to evaluate engineering protection such as forced draught ventilation of the Range(s). (*This lead management option is the least preferable since it will require the Range Management to conduct monitoring of the exhaust stream to ensure that it does not exceed the emissions criteria laid down in the State Environment Protection Policy (Air Quality Management). Further it will probably be necessary to install some type of filter system to remove particulate lead from the exhaust air which will require cleaning and maintenance, by appropriately competent persons.*)
9. Ammunition supplied by SSAA Vic to persons using the Association's Ranges should, as far as possible use lead-free priming. Shooters who load their own ammunition should be encouraged to use lead-free primers – via education campaigns and technical notes in relevant journals. (*The use of lead free primers is seen as a necessary part of lead reduction but this may affect certain competition pistol shooters who cannot obtain suitable primers. If all other sources of lead exposure are controlled then it should be possible to permit the use of some 'leaded' primers, since the amount of lead in any single primer amounts to no more than micrograms.*)
10. The policies noted above apply to Victoria but the matter should be discussed at a National level since most jurisdictions have some control on lead exposure.

4.0 NOISE

Requirements must be established for providing effective noise control measures and strategies to eliminate, prevent or minimise the occurrence of occupational noise-induced hearing loss at Eagle Park and Springvale Ranges.

4.1 Procedure

4.1.1. Instructions

Before applying below instructions, the FIRST and MOST important strategy is to ELIMINATE ALL NOISE HAZARDS

All facilities are to:

- Consider hearing conservation issues at work planning stage, including the design and selection of plant, equipment and work methods;
- Identify plant, equipment and tasks that may produce hazardous levels of noise;
- Establish register of equipment and tasks at the workplace that produce significant noise;

- Erect safety warning signs where excessive noise levels are identified ;
- Where necessary, arrange for noise risks assessment by measuring noise levels and noise exposure;
- Develop noise control measures to eliminate or reduce the factors contributing to generation of noise;
- Purchase and hire plant that complies with noise control specifications;
- Provide approved personal hearing protection devices if effective control of noise hazards cannot be achieved through engineering or administrative means;
- Provide training in hearing conservation;
- Provide hearing tests for staff exposed to noise.

4.1.2. Identification of Noise Hazards

A survey of all plant, equipment and processes emitting significant noise is to be undertaken to identify:

- equipment or work processes that are suspected of emitting a continuous noise level above 85 dBA;
- equipment with a suspected impact noise emission of greater than 140 dB (lin)
- peak for impact noise;
- where noise can cause an interference with communication and making warnings harder to hear.

As a guide, if you need to raise your voice to communicate with someone about one metre away, the noise is likely to be hazardous to hearing and communication.

4.1.3. Register of Noise Emitting Equipment and Tasks

A local register of all equipment used and tasks undertaken in a workplace is to be established. The register is to contain information on:

- equipment contained on the List of Noisy Equipment;
- the noise levels of the equipment or tasks, e.g. previous surveys, product information;
- the current method of noise exposure control for each piece of equipment or task, e.g. acoustic hoods, personal hearing protectors;
- the task/s for which the equipment is used, e.g. grinding metal;
- environmental factors which may impact on noise exposure e.g. working in tunnels, working in the open, type of surface;
- other equipment in use within the workplace, .e.g. two or more machines located together increase the noise exposure;

- whether other people are exposed to the noise from this equipment.

4.1.4. Noise Assessment

Noise surveys are to be conducted:

- where reliable noise data on plant and equipment is not available;
- where the environmental or work process conditions have the potential to increase the noise exposure hazard.

A noise assessment should be done by a competent person in accordance with the procedures in AS/NZS 1269.1 2005 – Occupational Noise Management.

Noise surveys involve the use of equipment to systematically measure noise levels and noise exposure.

The two main types of equipment used to measure noise are the:

- Integrating Sound Level Meter which provides information on various aspects of the noise being assessed such as the maximum and minimum noise level and the average noise level during the testing period;
- Sound Exposure Meter (Dosimeter) which is used to measure an individual's exposure to noise in terms of Daily Noise Dose.

Exposure to noise is taken to be measured at the position of the ears of a person, or at an equivalent of that position.

To get an accurate assessment of the noise exposure levels that exist in the workplace it may be necessary to engage a service provider who specialises in the measurement of occupational noise. Such specialists include occupational hygienists, acousticians and sound (acoustic) engineers.

The assessment can also be carried by the Authority's OHS Branch. Persons conducting Noise Surveys are to:

- determine the nature and degree of noise hazard that exists;
- review the current noise control measures;
- make recommendations for minimising the hazard, using noise control strategies;
- identify all the equipment and procedures used to assess noise exposure levels in accordance with Australian Standard AS 1269 - Hearing Conservation.

4.1.5. Noise Control Measures

Listed below are strategies which can be used to keep noise levels as low as reasonably possible and below the policy limits.

Reducing the Noise Level at Source

This is the preferred method of controlling noise. By reducing the amount of noise produced by a machine or during a task, people are exposed to less noise and therefore less risk of hearing damage.

Actions to reduce the amount of noise produced by a machine or during a task are:

- stop using a noisy machine;
- don't introduce a noisy machine;
- change the way work is carried out so hazardous noise is not produced;
- substitute the hazard with plant or processes that are quieter;
- modify plant and processes to reduce the noise.

Blocking the Transmission of Noise

If noise cannot be controlled at the source, the next approach is to prevent the noise being transmitted. Isolate the source of noise by using distance, barriers, enclosures and sound absorbing surfaces.

Preventing Exposure to Noise

Separating staff from the noisy equipment or tasks is the least preferred strategy for controlling noise because it does not remove the noise risk.

However, in circumstances where it is impractical to enclose or modify equipment, preventing noise exposure can be achieved by:

- enclosing staff in a noise control booth;
- rotating staff through tasks with reduced noise level exposures;
- organise schedules so that noisy work is done when only a few workers are present;
- notify workers and others in advance of noisy work so they can limit their exposure to it;
- keep workers out of noisy areas if their work does not require them to be there;
- sign-post noisy areas and restrict access;
- provide quiet areas for rest breaks for workers exposed to noisy work;
- limit the time workers spend in noisy areas by moving them to quiet work before their daily noise exposure levels exceeds the exposure standard;
- providing personal hearing protection devices.

Personal Hearing Protectors

Hearing protectors should only be used as a last resort or as an interim measure while control of noise exposure is being achieved by engineering or administrative means. No person should enter a hearing protection area during normal operation, unless wearing appropriate personal hearing protectors.

When choosing hearing protection the following should be considered:

- The noise - they need to be suitable for the degree of attenuation needed;
- Hygiene - ear plugs are difficult to keep clean and should only be used in clean areas;
- Environment - ear muffs can get very warm and may be difficult in hot environments, confined spaces or when other PPE has to be worn at the same time Individual - fitting is important, glasses wearers may not be able to wear ear muffs;
- Safety - they must not block out important safety warning signals e.g. fire alarm;
- Storage - there should be adequate provision for storage and cleaning when not in use (staff can be easily trained on their use, fit, care and maintenance).

Personal hearing protectors must be selected and maintained in accordance with AS/NZS 1269.3.

Safety Warning Signs

Safety warning signs are required when noise levels are in excess of a level equivalent to 85 dB(A) over an 8 hour working day. These signs are to be placed at the entrance to the noisy area and attached to noisy plant.

Safety warning signs inform people that hearing protection must be worn while in the noisy area. All safety warning signs are to comply with Australian Standard AS 1319.

Purchase and Hire of Plant and Equipment

When purchasing / hiring plant and equipment, compliance with General Specification for Purchase of Plant and Equipment (PG) is required. This policy requires that the machine is to comply with the Specification for Noise Levels of Plant and Equipment and a Noise Test Report, complying with the Specification, is to be submitted either with the quotation (preferable) or prior to the final inspection of the machine

New plant and equipment purchased is not to exceed noise levels specified in this policy.

Training of Staff

The success of the Hearing Conservation Program is dependent upon the co-operation of staff at all levels within the Authority. It is important that staff affected are made aware of their responsibilities in this regard.

Training is to be carried out using approved training packages.

All managers and supervisors who are responsible for staff exposed to noise are to receive training in:

- their responsibilities as defined in the Hearing Conservation Program;
- the effects of noise exposure;
- hearing conservation strategies - identification, assessment and control of workplace noise;
- the resources available to assist them in fulfilling their responsibilities;
- requirements of baseline assessment of staff on commencement or during employment.

Staff who are exposed to noise at work are to receive training in:

- the effects of noise exposure;
- action to control noise in the workplace;
- their responsibilities as defined in the Hearing Conservation Program;
- the correct use and maintenance of noise control equipment, including personal hearing protection devices.

New staff who will be exposed to noise are to receive training.

Health Surveillance / Monitoring Hearing

If any workers are likely to be exposed to noise, ototoxins and/or vibration in the following situations, hearing must be monitored by regular audiometric testing for exposure to:

noise above the exposure standard for noise ototoxins; where the airborne exposure (without regard to respiratory protection worn) is greater than 50% of the national exposure standard for the substance, regardless of the noise level both ototoxins at any level and noise with LAeq,8h greater than 80 dB(A) or LC, peak greater than 135 dB(C) hand-arm vibration at any level and noise with LAeq,8h greater than 80 dB(A) or LC, peak greater than 135 dB(C)

4.2 Responsibilities

Listed below are position titles names that are responsible for any specific activities associated with the development, monitoring, review and implementation of this policy. Include any delegations if appropriate.

Managers / Supervisors

Managers / Supervisors are to ensure that:

- policy requirements listed above are implemented;
- a noise risk assessment is completed when necessary;
- noise control devices are used;
- pre placement baseline/reference test are conducted prior to employment;
- instruction is given in the correct use and maintenance of noise control equipment and correct methods of operation for minimizing noise levels.

Staff

Staff are to assist management in:

- the identification of tasks and equipment which produce noise;
- co-operate with the procedures used to assess noise in the workplace;
- use and maintain noise control devices;
- participate in training;
- attend hearing tests/screening as instructed;
- report defects e.g. to plant that is likely to cause excessive noise or defects in PPE.

4.3 Definitions

Attenuation is the amount of noise reduction provided by a personal hearing protector.

Audiogram is the pictorial recording of an audiometric hearing test. It shows in decibels the threshold of hearing of pure tones at the following frequencies: 0.5, 1.0, 1.5, 2.0, 3.0, 4.0, 6.0 and 8.0 kHz.

Daily Noise Dose is a number which expresses the average amount of noise a person received during the working day.

A Daily Noise Dose (DND) = 1.0 is equivalent to an LAeq,8h of 85 dB(A).

Decibel (dB) The ear is sensitive to a very wide range of noise levels. To manage this variation, a logarithmic scale called decibels is used. This scale ranges from 0 dB (threshold of hearing) to 140 dB (threshold of pain). Because it is a logarithmic scale, an increase in noise levels by 3 dB has the effect of doubling the noise energy. Likewise, a decrease in noise levels by 3 dB has the effect of halving the noise energy.

dB(A) The 'A' indicates that the noise has been measured through a special filter with an A-weighting. This filter is designed to resemble the response of the human ear to noise.

dB(C)

The 'C' indicates that the noise has been measured through a filter with a C weighting. Used for the selection of hearing protectors.

dB(Lin) The 'Lin' indicates that the noise levels at different frequencies have been simply averaged without any weighting.

LAeq,8h is the equivalent average noise level, using an A-weighted filter, over an 8 hour period.

Noise is unwanted or damaging sound.

Noise Level is the strength or magnitude of noise, measured in decibels.

Noise Exposure Level is the total amount of noise a person is exposed to during the working day. It is expressed as an 8 hour average – LAeq,8h.

Normal Hearing The normal ear is sensitive to frequencies between 20 Hz and 20,000 Hz. The frequencies for speech are between 250 Hz and 4,000 Hz.

Sound is transmitted in the air by pressure waves which have two important characteristics: Amplitude = loudness, expressed in decibels Frequency = the number of complete sound waves (cycles) that pass a given point in one second. Frequency is measured in hertz (Hz).

ASSOCIATED DOCUMENTS / REFERENCES

SSAA (Vic) Accident / Incident notification form (attached)

SSAA (Vic) Accident / Incident notification form

Range Officer

NAME :		RO or SSAA N^o :	
BRANCH :		SUB-CLUB :	
DATE :	TIME :	AM/PM	

ACCIDENT / INCIDENT TYPE		PLEASE ✓ ONE	
FATALITY		NEAR MISS - NO INJURY	
SERIOUS PERSONAL INJURY		MINOR INCIDENT	

Person involved in Accident / Incident

NAME	ADDRESS	SSAA N ^o

Witness Details.

NAME	ADDRESS	SSAA N ^o

Briefly describe the Accident / Incident

If a more detailed description is required, please use another page.

Range Officer comments.

COPY TO	✓
SUB-CLUB COMMITTEE	
FIREARMS SAFETY OFFICER	

Range Officer Signature

Front Office Signature