



Carlos Da Rocha
Chair, Matrville Precinct
c/- 22 Harold Street
Matrville NSW 2036
www.matrville.info

1 May 2011

Implementation Team, Safe Work Australia
GPO Box 641, Canberra ACT 2601
Tel (02) 6121 5317
submissions@safeworkaustralia.gov.au
www.safeworkaustralia.gov.au

Dear Sir,

Model Work Health and Safety Regulations

Matrville Precinct would like to submit comment on the model work health and safety regulations with regard to the environmental noise impacts on communities with specific attention to reversing vehicle alarms.

A very recent publication by the World Health Organisation (WHO) Europe (2011) titled **“Burden of disease from environmental noise”**¹ defines health *‘as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity’*, and concludes that *‘... environmental noise should be considered not only as a cause of nuisance but also a concern for public health and environmental health.’*

The residents of many Sydney suburbs, but with particular reference to Matrville, La Perouse, Phillip Bay, Chifley, Banksmeadow, Botany, Kyeemagh, and Brighton-Le-Sands, are significantly impacted on by environmental noise such as truck movements, the clanging of shipping containers, ship generators, processing plants, industrial fans, aircraft and most annoyingly the beeping of reversing forklifts/heavy vehicles. Depending on wind direction, the peaceful ambience of any one of these residential suburbs will be intruded upon by the incessant, high pitched, irritating sound of multiple reversing forklifts/heavy vehicles. It should be noted that many of the industrial operations surrounding the Port Botany area work 24 hours a day, seven days a week.

We acknowledge and appreciate that on large industrial sites alerts and alarms are necessary to protect employees and visitors from danger.

¹ http://www.who.int/quantifying_ehimpacts/publications/e94888.pdf

However if the beeping of a reversing forklift can be heard 1km away, inside a lounge room with windows closed and TV on, IS THE ALARM TOO LOUD? Many thousands of residents, for whom there is no possible imminent danger, are affected this way. A very rough approximation of the number of beepers heard each hour is between 30 and 50.

In addition to the above mentioned WHO publication, we would also like to draw your attention to the following documents:

- **“Review of alternatives to ‘beeper’ alarms for construction equipment”**² published by NSW Department of Environment, Climate Change and Water (DECCW), 2009 which concludes *‘This review has shown that there is a range of alternatives to ‘beeper’ alarms that are feasible - ie are available and can be used with appropriate worker training. These alternatives are also reasonable – ie do not impose a significant cost per item of plant on industry and, subject to appropriate selection, do not reduce on-site worker safety. It is up to industry to consider these alternatives, along with any other relevant factors, when designing their system of work to minimise noise impact on the community surrounding the site – particularly when planning to work at night.’*

Noises audits in Matrville have identified reversing alarm that intermittently exceed night time noise limits at residences over 1km away but Industry state it’s a WorkCover requirement that these alarms are this loud, yet the DECCW document cited above identifies alternatives that **‘do not reduce on-site worker safety’**.

- **“The health effects of environmental noise - other than hearing loss”** published by the Department of Health and Ageing (DHA), 2004³. States *‘There is a need to cross broad areas of social and environmental policy – in product design and safety, planning and transport – to tackle the acknowledged problems emerging from the scientific evidence on environmental noise and its human health effects.’*

The DHA determined that the following noise characteristics generate the most annoyance: loudness, frequency, duration; and increasing intensity. It affirmed *‘Intermittent, irregular, tonal, pulse or rhythmic noise generates more annoyance than steady noise of the same intensity.’* For monitoring purposes, as per the DECCW, tonal noises are attributed an additional 4 dBA due their annoying nature.

For the purposes of alerting an individual to imminent danger, the above noise characteristics are very useful, relevant and accurately describe the loud, high-pitched, intermittent, yet frequent, pulsing tone used for reversing forklifts/heavy vehicles. However, it is exactly these noise characteristics that significantly impact on a community’s health and wellbeing.

Matrville Precinct request that Safe Work Australia, in developing model work health and safety laws, reflect on the WHO’s recent report and give serious consideration to environmental noise, appreciating that at a legislation and policy level there is the capacity to affect change. As until work health and safety laws reflect the current evidence regarding the detrimental impacts environmental noise has on human

² <http://www.environment.nsw.gov.au/resources/noise/beeperalarm.pdf>

³ http://www.health.gov.au/internet/main/publishing.nsf/Content/health-publhlth-publicat-document-metadata-env_noise.htm

health, then government agencies, local councils and industries will continue to deflect community concerns on the basis of work safety.

With particular reference to the current laws regarding forklift/heavy vehicle reversing alarms, Matrville Precinct also request that Safe Work Australia support and indeed promote alternatives as recommended by DECCW.

Regards,

Carlos Da Rocha

Chair, Matrville Precinct

0419 204 056

matprecinct@gmail.com.au

C.C

Safe Work Australia, info@safeworkaustralia.gov.au

WorkCover NSW, Locked Bag 2906, LISAROW 2252

Hon. Michael Daley, MP, Member for Maroubra - maroubra@parliament.nsw.gov.au

Hon. Kristina Keneally, MP, Member for Heffron - heffron@parliament.nsw.gov.au

Hon. John Flowers, MP, Member for Rockdale - rockdale@parliament.nsw.gov.au

Hon. Jillian Skinner, MP, NSW Minister for Health - office@skinner.minister.nsw.gov.au

Hon. Duncan Gay, MLC, NSW Minister for Roads and Ports - office@gay.minister.nsw.gov.au

Hon. Gladys Berejiklian, NSW Minister for Transport, office@berejiklian.minister.nsw.gov.au

Cr Murray Matson, Mayor, Randwick City Council - murray.matson@randwick.nsw.gov.au

Ray Brownlee, General Manager, Randwick Council - general.manager@randwick.nsw.gov.au

Cr Robert Belleli, South Ward Councillor, Randwick City Council - robert.belleli@randwick.nsw.gov.au

Cr Ron Hoenig, Mayor, Botany Bay City Council - mayor@botanybay.nsw.gov.au

Peter Fitzgerald, General Manager, Botany Bay City Council - council@botanybay.nsw.gov.au

Cr Bill Saravinovski, Mayor, Rockdale City Council - bsaravinovski@rockdale.nsw.gov.au

Chris Watson, General Manager, Rockdale City Council - rcc@rockdale.nsw.gov.au

Ben Lim, Site Environment Engineer, Botany Industrial Park - ben.lim@orica.com

Shaun Kilmartin, General Manager, AMCOR - 1891 Botany Rd, Matrville NSW 2036

Shane Hobday, General Manager Safety Security & Environment, Sydney Ports - shobday@sydneyports.com.au

Richard Johnstone, DP World - richard.johnston@dpworld.com

Neil Truskett, Patricks - n.truskett@patrick.com.au

DECCW - info@environment.nsw.gov.au

Robert Marr, DECCW - Robert.Marr@environment.nsw.gov.au

Environment Defenders Office, NSW, Level 1, 89 York Street, Sydney NSW 2000