

Model Work Health and Safety Codes of Practice - Public Comment Response

The National Electrical and Communications Association (NECA) is the peak industry association representing contractors responsible for the delivery of electrical, voice and data communications systems across Australia. NECA has 5000 businesses as members. Our members combined employ a total of 80,000 workers, with NECA employing directly more than 2,000 apprentices in Group Training Companies.

Member businesses range from very small operations, often comprising a single individual, or one owner with just a few employees, to larger national companies employing many more people. Currently NECA membership profile includes some 1500 businesses employing over five staff, over 100 who employ more than 50 staff and several who employ over one thousand electrical workers.

NECA actively represents the needs and entitlements of contractors within the Australian Government and industry, ensuring members' needs are heard. NECA works to steer the future of the industry on critical issues such as licensing and regulations, training and education, skills and labour shortages, workplace relations and occupational health and safety.

NECA is most supportive of the OHS harmonisation process that promises to reduce the administrative burden on business. This is important for the substantial portion of our members who work across borders, but uniformity generally provides a sound base for efficiencies and ongoing improvement in health and safety outcomes.

NECA has worked tirelessly with many participants in the process to achieve clear legislation that projects a framework that encourages a culture of safety within our industry. The detail of our submission of comments regarding the draft model Code of Practice – *Managing electrical risk in the workplace* are contained within the submission provided by the Australian Chamber of Commerce and Industry (ACCI) and NECA endorses that submission.

It should be noted that NECA has made many recommendations for improvements in providing guidance for businesses and workers to achieve compliance with the health and safety duties under the WHS Act and Regulations. Some of the difficulties with this regard are a reflection of complexities found in the definitions and philosophies contained in Part 4.7 of the regulations. While NECA supports the concept of a general prohibition on energised electrical work and agree that the legislative constraints can be used as an effective deterrent, it is an imperative that such impediments do not inhibit safe work practices, nor due to their necessity and grouping cause a weakening of the prohibition.

NECA believes that there should be further consultation and involvement of industry in securing a framework that promotes the highest levels of safety for the industry.

Thank you for the opportunity to comment and participate in this review.