

Thursday 29 July 2021

Ms Michelle Baxter  
Chief Executive Officer  
Safe Work Australia  
Canberra ACT 2601

Email: [WESconsult@swa.gov.au](mailto:WESconsult@swa.gov.au)

Dear Ms Baxter,

**Re: Safe Work Australia's (SWA) consultation on draft Workplace Exposure Standard (WES) proposals for wood dust**

I write in response to Safe Work Australia's (SWA) call for public feedback on a draft WES proposal for wood dust.

The Tasmanian Forest Products Association (TFPA) is the peak body for forestry that undertakes policy development, lobbying and advocacy for members interests. TFPA represents all elements of the value chain from the sustainable harvesting of plantations and multiple use natural forest resource including forest establishment and management, harvesting and haulage, processing of timber resources and manufacture of pulp, paper and bioproducts.

The TFPA is extremely concerned about SWA's existing proposal to change the WES for wood dust. These concerns stem from:

- the discrepancies in health benefits estimated by SWA from selected scientific literature that will need a more thorough review.
- uncertainty about how any changes are to be implemented.
- the very limited scope of SWA's review (including no Australian timber species specific scientific review and no sector-specific cost/benefit impact consideration).
- the significant adverse impacts that adopting the proposal would have on the Australia's timber products industry, on workers, and on consumers. Potential job losses and closure of operations located in regional areas that are unable to meet the proposed standard and impact on Australia's competitiveness.

If adopted, SWA's proposed reduction in the wood dust WES to a Time Weighted Average (TWA) of 0.5mg/m<sup>3</sup> for both softwoods and hardwood timber species, would impose the most stringent limits in the world on Australian manufacturing sites and will have significant socioeconomic implications across the entire Australian timber industry.

We support the Australian Forest Products Association's (AFPA) detailed industry submission and proposed recommendations to:

1. Reduce the current TWA of 5.0mg/m<sup>3</sup> to 2.0mg/m<sup>3</sup> for softwoods. This is a significant reduction and aligns the Australian softwood timber products industry to recently established wood exposure limits in Europe and New Zealand. The reduced TWA also clearly demonstrates the commitment of the timber product manufacturing to investment in operational improvements and commitment towards the awareness and management of any potential health issues associated with wood dust.
2. Maintain the current TWA of 1.0mg/m<sup>3</sup> for hardwoods. This limit would remain one of the most stringent in the world and with no evidence of adverse hardwood dust health-related indicators in the Australian hardwood industry, there is no basis for change.
3. Independent TWAs should remain for hardwood and softwood timber species which would be representative of the differences in their chemical composition and sensitisation potential.
4. Undertake a more in-depth assessment for specific timber species wood dust exposure in Australia.

We are greatly concerned that the SWA WES proposal of a TWA of 0.5mg/m<sup>3</sup> is not practical, will not result in the health benefits envisaged by SWA, will not be economically or commercially viable, and potentially result impacts to business, employment and the community.

The TFPA urge SWA to consider and adopt AFPA's WES proposal for wood dust.

Yours sincerely,



**Nick Steel**  
Chief Executive Officer