



23rd June 2017

By email: cwpsc@parliament.qld.gov.au

To the Coal Workers' Pneumoconiosis Select Committee,

**Re: Response to the Coal Workers' Pneumoconiosis Select Committee Executive Summary,
Report No. 2, 55th Parliament Coal Workers' Pneumoconiosis Select Committee**

As with many others in the Queensland community Pacific National is concerned about the the re-emergence and re-identification of coal workers' pneumoconiosis within the coal mining industry. Pacific National is supportive of risk based measures that help the industry to systematically eliminate this issue.

Pacific National appreciates the opportunity to provide feedback on the Inquiry's recommendations. Pacific National understands that due to the extension in the Inquiry's Terms of Reference that some of the recommendations may change as the Inquiry continues. Despite this Pacific National provides the following feedback in order to progress this critical conversation.

If you require any further information please don't hesitate to contact the Pacific National HSE Manager Queensland Coal and Bulk – Prue Dunstan on or email

Yours faithfully,

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Safety is one of Pacific National core values and we are deeply committed to operating our business with the goal that each and every one of our workers goes “*home safely every day*”.

As a business we assess hazards and risks for our workers through the adoption and use of industry best practice risk management processes. These processes allow for the thorough identification, assessment, application of control treatments, monitoring and review of our health and safety hazards and risks. Through this process we seek to apply the highest level of control in order to reduce the risk so far as is reasonably practicable or to an acceptable level.

Pacific National provides the following feedback in order to progress this critical conversation.

Recommendation 65

An expanded or additional category of workers, defined as ‘coal worker’, should be established to include workers involved in the transportation and handling of coal outside a ‘coal mine’ including rail workers (e.g.: coal train loaders and drivers), port workers (e.g.: dozer, stacker/reclaimer, and ship loader operators), power station workers, and maritime workers (e.g.: tug and line boat crew).

Pacific National Response to Recommendation 65:

Pacific National currently undertakes health assessments, as required by the rail safety legislation, of all rail safety workers employed in our workforce. We do not believe that our employees, rail workers, should be included in an expanded or additional category as ‘coal worker’.

We would like to highlight that workers within the coal supply chain undertake vastly different work tasks. Subsequently these different worker types have varied personal exposure profiles dependent on the actions they undertake. A coal mine worker in an underground or open pit mine has exposures to dusts different to that of a train driver in a locomotive cabin. The National Rail Safety Law is designed to regulate the specific risks faced by rail workers, including risks arising from dust inhalation.

In compliance with our obligations under the National Rail Safety Law and Work Health and Safety legislation, Pacific National has determined the risk profile of our rail workers in the coal supply chain through a comprehensive and ongoing program of exposure monitoring, as detailed in Pacific National’s previous submission to the Inquiry. We risk assess worker tasks and we monitor and review the effectiveness of controls in relation to the worker. As a result of the outcome of this monitoring we are able to justify a low risk delegation of our workforce in the context of exposure to respirable coal dust and respirable crystalline silica. Our personal exposure monitoring has shown that our workers have returned results far beneath the current exposure standards. We will continue our monitoring in the Queensland coal operations in order to provide verification and validation of our low risk exposure profile.

Detail about our monitoring process and risk assessment was provided in Pacific National’s address to the inquiry on 17 March 2017.

The level of regulation in the rail industry is sufficient to cover the risks of dust inhalation facing rail workers as identified by the Inquiry and further regulation, in our view, would not decrease the risk of Pneumoconiosis being contracted by rail workers.

Conclusion

Pacific National is supportive of risk based measures that help the industry to systematically eliminate coal workers’ pneumoconiosis.

As a business we have determined the risk profile of our rail workers in the coal supply chain. Through this process Pacific National is confident in the low risk delegation of our workforce in the context of exposure to respirable coal dust and respirable crystalline silica. Given this low risk profile we do not consider it appropriate or necessary to expand the definition of coal worker to include rail workers involved in the transportation of coal.

Pacific National appreciates the opportunity to provide feedback on the Inquiry's recommendations.

