

Bird Proofing Netting and Physical Pest Barriers

Business Name:		ABN:
Business Address:		
Contact Person:	Phone:	Email:

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. WHS Governance, Legal Compliance and PCBU Duties	<ul style="list-style-type: none"> Lack of formal WHS governance for bird proofing and pest barrier activities Failure to identify legal duties under WHS Act 2011 and WHS Regulation for work at height, hazardous manual tasks and biological hazards No clear allocation of WHS responsibilities between PCBU, officers, workers and subcontractors Inadequate consultation mechanisms with workers and HSRs on bird proofing and pest control systems Failure to integrate pest management controls into the overall WHS management system Inadequate due diligence by officers regarding pest-related health risks (zoonotic disease, contaminated droppings) 	4A	<ul style="list-style-type: none"> Develop and implement a WHS governance framework that explicitly covers bird proofing netting, physical pest barriers and pest-related activities on roofs and gutters Undertake and document a legal compliance review against WHS Act 2011, WHS Regulation, relevant Codes of Practice (e.g. Work at Heights, Hazardous Manual Tasks, Managing the Work Environment and Facilities) and applicable Australian Standards (AS/NZS 1891, AS/NZS 4488, AS/NZS 3500 for gutters/drainage interactions) Define and document PCBU, officer, management, supervisor and worker duties specific to pest barrier installation, maintenance and guttering interactions with vermin Establish a WHS policy and supporting procedures for pest management works, including risk management, incident reporting, training, and contractor control Implement formal consultation processes (toolbox talks, WHS committee, HSR engagement) that specifically address pest-related risks and control systems Require periodic WHS due diligence reports to senior management on pest management-related risks, incidents and compliance findings Review and update the WHS management system annually or after significant incidents or legislative change relating to pest and bird management 	3H
2. Risk Management Framework for Bird Proofing and Pest Barriers	<ul style="list-style-type: none"> No structured risk assessment process for bird proofing netting and physical pest barrier projects Inconsistent identification of risks linked to vermin points during gutting tasks, roof access and material disruption Failure to consider combined or cumulative risks (work at height plus biological exposure plus pest handling) Risk assessments focusing only on task steps (SWMS) rather than system and management controls Risk registers not updated for new pest barrier systems, materials or methods Inadequate review of controls following incidents, near misses or client complaints about pest incursions 	4A	<ul style="list-style-type: none"> Implement a formal WHS risk management procedure that requires project-level and organisational-level risk assessments for bird proofing and pest barrier activities Develop standardised WHS risk assessment templates that prompt consideration of bird and vermin hazards, blocked gutters, pest habitats, work at heights, manual tasks and environmental impacts Maintain a central WHS risk register that includes system-level risks for creation of physical barriers, unblocking pest entry points and disrupting pest habitats Require that SWMS are informed by, and linked to, higher-level risk assessments and organisational controls for pest management work Set review triggers for risk assessments (e.g. change in work methods, new barrier products, incidents, client feedback, legislative updates) Provide manager and supervisor training on risk assessment techniques specific to pest and bird proofing contexts, emphasising root causes rather than task-by-task actions Conduct periodic internal audits of risk assessments to verify quality, completeness and implementation of identified controls 	2M
3. Contractor and Worker Competency, Licensing and Training	<ul style="list-style-type: none"> Workers and subcontractors installing bird proofing netting without competency in working at height, guttering interfaces and pest management 	4A	<ul style="list-style-type: none"> Develop minimum competency requirements for all personnel involved in bird proofing and physical pest barrier work, including nationally recognised working at heights training and, where relevant, pest management licensing 	2M

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	<ul style="list-style-type: none"> Lack of training in zoonotic disease risks from vermin, bird droppings and nesting materials Unlicensed or inadequately supervised pest management contractors using baits or pesticides in conjunction with physical barriers Poor understanding of structural risks when attaching barriers to gutters, fascias and roofing components Inadequate induction on site-specific hazards such as existing vermin infestations, fragile roofing or restricted access areas No verification of training currency (e.g. work at heights, first aid, EWP operation) 		<ul style="list-style-type: none"> Implement a formal competency management system to record, verify and track worker qualifications, licences and refresher training Provide specific training on zoonotic disease risks, safe handling of droppings and nesting materials, and hygienic work practices during guttering and barrier installation Deliver detailed site and task-specific inductions that address pest presence, roof and gutter conditions, access constraints, and emergency procedures Ensure only competent and, where required, licensed pest management technicians apply chemical controls in combination with physical barriers Regularly review training content to incorporate product changes, new installation techniques, updated legislation and lessons learned from incidents Include competence assessment (on observation of work, knowledge checks) as part of performance reviews for supervisors and leading hand 	
4. Design, Selection and Engineering of Bird Proofing Systems	<ul style="list-style-type: none"> Selection of netting and barrier systems that are incompatible with existing roof, guttering and façade structures Poor design of physical barriers leading to trapping of debris and water, causing gutter blockages, corrosion and structural damage Insufficient consideration of wind loading, UV degradation and long-term durability of netting and fixings Designs that create new entanglement hazards for workers or emergency responders Ineffective designs that fail to block pest entry points, leading to ongoing infestations and repeated exposure of workers Use of non-compliant or untested products lacking appropriate fire, strength or weather resistance properties 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
5. Structural Integrity, Load Management and	<ul style="list-style-type: none"> Overloading of gutters, fascias, fixings and roof members from netting tension, 	3H		1L

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Interaction with Buildings	<ul style="list-style-type: none"> accumulated debris and nesting materials • Damage to roofing membranes and gutter linings from inappropriate drilling, fastening or sealing of barriers • Creation of water ingress paths leading to mould growth, rot and structural deterioration • Failure to assess existing building condition before installing barriers, especially on older or corroded guttering systems • Inadequate documentation of structural attachment points, resulting in uncontrolled modifications by future workers • Barriers impeding safe operation of roof hatches, skylights, ventilation equipment or fire systems 		[REDACTED]	
6. Biological, Health and Hygiene Risk Management	<ul style="list-style-type: none"> • Exposure to bird and vermin droppings containing pathogens (e.g. cryptococcosis, psittacosis, leptospirosis) • Contact with live vermin, nesting materials, parasites and decomposing carcasses during general cleaning and entry-point unblocking • Aerosolisation of dried droppings during cleaning, cutting and other activities • Inadequate decontamination procedures leading to cross-contamination of tools, vehicles and clothing • Lack of vaccination programs where recommended (e.g. tetanus) for workers regularly dealing with vermin pests • Insufficient hygiene facilities (handwashing, change areas) at or near work sites 	4A	[REDACTED]	2M

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7. Working at Heights, Access Systems and Fall Protection	<ul style="list-style-type: none"> Inadequate organisational systems for safe roof and gutter access during installation of bird proofing netting and barriers Use of non-compliant ladders, scaffolds or temporary edge protection systems No formal hierarchy of control approach to eliminate or minimise work at height where possible Poor planning of rope access, EWP use or roof anchor systems leading to uncontrolled fall risks Lack of periodic inspection and recertification of fall arrest systems used for pest barrier work Insufficient supervision and competency verification for workers performing high-risk construction work at heights 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
8. Manual Handling, Ergonomics and Use of Tools/Equipment	<ul style="list-style-type: none"> Poor manual handling systems for lifting and installing long runs of netting mesh panels and fixing to roofs and gutters Repetitive, awkward postures when working along gutters, eaves and confined roof spaces Inadequate selection and maintenance of hand and power tools for cutting, fixing and tensioning barriers Noise, vibration and cut hazards from poorly controlled tool use Lack of engineered aids (winches, hoists, material lifts) for moving materials to and from the work area Insufficient consideration of fatigue due to physically demanding, weather-exposed tasks 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	1L
9. Environmental and Public Safety Risk Management	<ul style="list-style-type: none"> Uncontrolled disturbance of bird and vermin habitats causing pests to move into occupied areas of the building 	3H		1L

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	<ul style="list-style-type: none"> • Debris, droppings and materials falling from height onto public areas, vehicles or neighbouring properties during installation or cleaning • Inadequate segregation of work areas from building occupants, visitors and the public • Improper disposal of contaminated waste, offcuts, old netting and carcasses leading to environmental contamination and attraction of new pests • Noise and visual disruption causing complaints or unsafe interactions with building users • Failure to consider wildlife welfare and regulatory requirements when excluding birds and other animals 		[REDACTED]	
10. Project Planning, Scheduling and Fatigue Management	<ul style="list-style-type: none"> • Inadequate planning of work sequences for gutter cleaning, habitat disruption and barrier installation leading to rushed or unsafe practices • Work scheduled in extreme weather conditions (heat, storms, high winds) increasing risk for workers at height • Insufficient time allocated for access setup, decomposition and clean-up activities • Poor fatigue management, particularly for remote or regional projects involving long travel times and roof-based physical work • Lack of integration between pest management schedules and other trades leading to congestion and interference on roofs and in gutters • Insufficient contingency planning for unanticipated pest infestations uncovered during guttering works 	3H	[REDACTED]	2M
11. Contractor Management,	<ul style="list-style-type: none"> • Engagement of subcontractors without adequate WHS systems for pest barrier and gutter-related work 	3H		1L

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Procurement and Supply Chain Controls	<ul style="list-style-type: none"> • Procurement decisions based solely on price rather than safety performance and product quality • Supply of substandard or counterfeit netting, fixings and barrier components • Inconsistent communication of WHS expectations and site rules to contractors dealing with vermin pests and roof access • Lack of monitoring and performance review of contractors' WHS compliance • Failure to specify maintenance and inspection requirements for supplied systems in contracts and handover documents 		[REDACTED]	
12. Emergency Preparedness, Incident Response and First Aid	<ul style="list-style-type: none"> • Lack of documented emergency response procedures for falls from height, exposure to vermin-borne disease, or structural failure of barrier • Inadequate rescue planning for workers using fall arrest systems on roofs and gutters • Insufficient first aid coverage and equipment for remote or elevated work locations • Poor incident reporting and investigation systems, resulting in repeated bird and vermin related incidents • No protocols for managing contact with aggressive birds, wasp nests or unexpected animal encounters during habitat disruption • Delayed access for emergency services due to poorly planned site access and roof layouts 	3H	[REDACTED]	2M
13. Inspection, Maintenance and Lifecycle Management of Barriers	<ul style="list-style-type: none"> • No formal inspection regime for installed bird proofing netting and physical pest barriers 	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> Degradation of netting, fixings and sealants over time leading to barrier failure and renewed pest entry Accumulation of debris and nesting materials behind barriers causing gutter blockages, water damage and increased vermin activity Failure to identify and repair damage following storms, building works or unauthorised alterations by others Lack of documentation for maintenance responsibilities between PCBU, client and building manager Unsafe maintenance practices due to absence of access plans or system information for existing installations 		[REDACTED]	
14. Information, Documentation, Consultation and Change Management	<ul style="list-style-type: none"> Incomplete documentation of risk assessments, designs, installation records and maintenance plans for pest barriers and gutter-related works Poor communication of known pest issues, entry points and historical incidents to workers and contractors Lack of consultation with workers when changes are made to bird proofing systems, products or materials Uncontrolled changes to designs, materials or installation techniques on site without appropriate approvals Inadequate record-keeping for client handover, leading to future unsafe modifications or removal of barriers Failure to capture worker feedback and incident learnings into system improvements 	3H	[REDACTED]	2M

EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2011
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

Victoria

Occupational Health and Safety Act 2004
 Occupational Health and Safety Regulations 2017
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

New South Wales

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2025
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/list-codes-of-practice>

Western Australia

Work Health and Safety Act 2020
 Work Health and Safety Regulations 2022
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/factsheets-and-resources/codes-of-practice>

Safe Work Australia Links

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

South Australia

Work Health and Safety Act 2012 (SA)
 Work Health and Safety Regulations 2012 (SA)
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

Tasmania

Work Health and Safety Act 2012
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012
 Work Health and Safety Regulations 2012
 Work Health and Safety (Transitional) Regulations 2012
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.