

**Commercial Diving and Underwater Work**

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

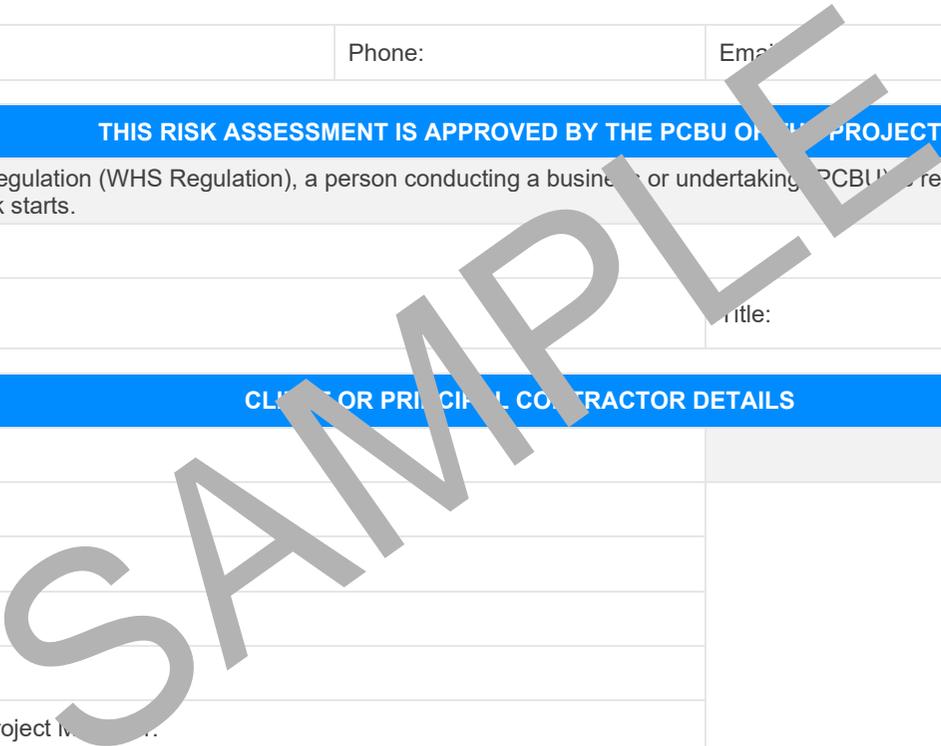
**THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT**

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			<b>Elimination</b> Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	<b>Substitution</b> 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.	<b>Engineering</b> 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:	
<b>4A</b>	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.
<b>3H</b>	Review and approve additional controls for the task parts. Senior supervisor sign-off needed.
<b>2M</b>	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
<b>1L</b>	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
<b>Catastrophic</b>	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
<b>Major</b>	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
<b>Moderate</b>	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
<b>Minor</b>	First-aid only, no lost time	negligible delay	Isolated non-conformance
<b>Insignificant</b>	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 & Diving Management System	<ul style="list-style-type: none"> <li>Absence of a documented diving health and safety management system covering all commercial diving and underwater work</li> <li>Failure to identify and comply with WHS Act 2011, WHS Regulations and AS/NZS 2299 series for occupational diving operations</li> <li>Unclear roles, responsibilities and authority for Diving Supervisor, Dive Coordinator and PCBU officers</li> <li>Inadequate consultation with divers, tenders and vessel crew on WHS matters</li> <li>No formal process for reviewing diving safety performance, incidents and near misses</li> <li>Inadequate integration of diving operations into the broader organisational WHS management system</li> <li>Lack of documented risk assessments for specialised tasks such as abalone diving, grouting under jetties, marine salvage and marine biology</li> <li>Ineffective contractor and subcontractor management for shared diving worksites</li> <li>Poor document control leading to use of out-of-date procedures, decompression tables or emergency plans</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop, implement and maintain a documented Diving Safety Management System (DSMS) aligned with WHS Act 2011, WHS Regulations and AS/NZS 2299 series</li> <li>Formally appoint a competent Diving Supervisor for each operation with clearly defined responsibilities and authority</li> <li>Establish a WHS governance framework that includes oversight of commercial diving activities by senior management and officers</li> <li>Implement a procedure to identify, monitor and review applicable legislation, Australian Standards, codes of practice and client requirements relevant to diving and underwater work</li> <li>Ensure involvement of Health and Safety Representatives (HSRs), divers and tenders in consultation, risk assessment and procedure development</li> <li>Integrate diving WHS objectives and targets into the organisation's overall WHS plan and performance reporting</li> <li>Maintain a controlled document system for all diving procedures, decompression tables, emergency plans, permits and risk assessments with scheduled reviews</li> <li>Implement a formal contractor management procedure including prequalification, WHS capability assessment and alignment of diving procedures on multi-PCBU sites</li> <li>Conduct annual management reviews of the DSMS, including audit findings, incident data, corrective actions and improvement plans</li> </ul>	2M
2. Competency, Licensing, Training & Fitness to Dive	<ul style="list-style-type: none"> <li>Use of divers, supervisors or tenders without appropriate commercial diving qualifications, endorsements or tickets</li> <li>Inadequate specialised training for abalone diving, marine salvage, marine biology sampling, confined space diving and grouting under jetties</li> </ul>	4A	<ul style="list-style-type: none"> <li>Implement a competency management system specifying minimum qualifications, experience and licensing requirements for each diving role in accordance with AS/NZS 2299 and regulatory requirements</li> <li>Require current occupational dive medicals conducted by approved diving medical practitioners, with results recorded and expiry dates tracked</li> <li>Develop and enforce training and competency matrices covering commercial diving, surface-supplied systems, scientific diving, abalone harvesting, salvage operations and confined area diving</li> <li>Conduct documented practical competency assessments, including emergency drills (lost diver, unconscious diver, contaminated diver, marine life injury) at predetermined intervals</li> </ul>	2M

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	<ul style="list-style-type: none"> <li>Lack of documented competency assessment and verification of currency for diving and emergency skills</li> <li>Insufficient training in recognition and management of decompression illness, barotrauma and marine stinger exposures</li> <li>Inadequate understanding of WHS duties, stop-work authority and reporting obligations amongst dive team members</li> <li>Failure to ensure ongoing fitness to dive including medical conditions, medications, fatigue and psychological fitness</li> <li>No system for tracking and limiting cumulative diving exposure, repetitive dives and surface intervals</li> <li>Inadequate induction for new or visiting scientific divers, commercial abalone divers and salvage crews onto computerised systems</li> </ul>		<ul style="list-style-type: none"> <li>Provide mandatory WHS induction for all dive team members addressing duties under WHS Act 2011, incident reporting and right to cease unsafe work</li> <li>Establish a fitness for work procedure addressing fatigue, drugs and alcohol, thermal stress and psychological readiness for diving</li> <li>Maintain a diver logbook and central register recording dive profiles, tasks, exposure, training and assessment dates to monitor cumulative load</li> <li>Ensure all personnel potentially handling dangerous marine life and marine animals with stingers receive specific hazard identification and first aid training (e.g. vinegar application, pressure immobilisation where appropriate)</li> <li>Review and refresh key training emergency response and first aid training at least annually with records retained</li> </ul>	
3. Dive Planning, Risk Assessment & Job Hazard Analysis	<ul style="list-style-type: none"> <li>Diving operations commenced without a formal dive plan, risk assessment or job hazard analysis for the specific worksite and task</li> <li>Failure to consider environmental hazards such as currents, visibility, weather, vessel traffic, marine life, depth, overhead environments and entrapment risks</li> <li>Inadequate planning for specialist work including abalone diving zones, grouting under jetties, marine salvage lifts and biological sampling in sensitive habitats</li> <li>Poor coordination of simultaneous operations (SIMOPS) such as vessel movements, lifting operations, pile driving or dredging near divers</li> <li>Lack of contingency planning for changes in environmental conditions, task scope or equipment failure</li> <li>Overly optimistic time estimates leading to rushed activities and</li> </ul>	4A	<ul style="list-style-type: none"> <li>Implement a standardised dive planning and risk assessment procedure requiring written dive plans approved by the Diving Supervisor prior to each operation</li> <li>Use a structured risk assessment tool (e.g. risk matrix aligned with organisational WHS procedure) tailored to specific underwater tasks including abalone collection, salvage, grouting and scientific sampling</li> <li>Mandate pre-job planning meetings involving divers, tenders, vessel master and relevant contractors to identify hazards and agree on controls and communication protocols</li> <li>Include assessment of SIMOPS in the planning process and implement coordination controls such as exclusion zones, permit-to-work interfaces and lock-out of conflicting activities</li> <li>Require specialist planning checklists for confined area diving, under-jetty work and salvage to address entrapment, overhead hazards, silt-out and structural integrity</li> <li>Incorporate environmental forecasts, tides, currents, temperature and visibility into dive scheduling and go/no-go criteria</li> <li>Establish formal change management triggers where significant variations in depth, task, weather or personnel require review and re-authorisation of the dive plan</li> <li>Document contamination and water quality assessments and, where required, classify operations as contaminated diving with additional controls and PPE</li> <li>Retain planning documentation, risk assessments and permits for statutory and internal review</li> </ul>	2M



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Decompression Systems	<ul style="list-style-type: none"> <li>• Insufficient breathing gas reserves for planned depth, duration and contingencies</li> <li>• Incorrect gas mix selection or labelling, including nitrox or mixed gas errors</li> <li>• Inadequate decompression planning and failure to follow approved tables or dive computer protocols</li> <li>• Lack of systems to monitor and manage repetitive dives, surface intervals and no-decompression limits, especially for abalone divers conducting multiple short dives</li> <li>• Absence or inadequate capacity of emergency gas supply and bailout systems, particularly in confined or overhead environments</li> <li>• No access to appropriate recompression chamber support for the type and location of diving operations</li> <li>• Poor record-keeping of dive profiles, gas mixes and decompression data hindering incident investigation and exposure tracking</li> </ul>		<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>	
6. Vessel Operations, Navigation & Worksite Access	<ul style="list-style-type: none"> <li>• Collision between work vessels or divers due to poor maneuvering, lookout or communication</li> <li>• Unsafe boarding, transfer and access arrangements between shore vessel and dive platform</li> <li>• Inadequate vessel stability, anchoring or positioning systems during diving and salvage operations</li> <li>• Poor coordination between vessel master, Diving Supervisor and deck crew regarding diver location and movements</li> <li>• Uncontrolled interaction with other marine traffic in abalone harvest areas or busy ports and marinas</li> </ul>	3H	<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

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	<ul style="list-style-type: none"> <li>Lack of systems for managing sea state, weather limits and bar crossings for dive vessels</li> <li>Inadequate control of lifting and lowering of equipment, salvage items or grout hoses in proximity to divers</li> <li>Insufficient emergency egress routes for divers working under jetties, wharves or in confined channels accessed by vessel</li> </ul>		[REDACTED]	
7. Environmental & Site Conditions (Weather, Tides, Visibility, Currents)	<ul style="list-style-type: none"> <li>Unexpected changes in tides, currents or swell leading to diver exhaustion, separation or entrapment</li> <li>Low visibility from silt, plankton blooms, stormwater, grouting activities or salvage disturbance</li> <li>Extreme cold or heat stress affecting diver performance and decision-making</li> <li>Underestimation of surge and wave action around reefs, abalone grounds and jetty pylons</li> <li>Failure to identify and manage hazard from overhead structures, pipes, mooring lines and debris in confined sites</li> <li>Environmental conditions causing disorientation for divers performing precise tasks such as sampling or grouting under jetties</li> <li>Degraded water quality causing illness, infection or exacerbation of marine life stings and bites</li> </ul>		[REDACTED]	2M
8. Marine Life, Dangerous Species & Biological Hazards	<ul style="list-style-type: none"> <li>Contact with venomous or stinging marine animals such as box jellyfish, bluebottles, cone shells, stonefish and stingrays</li> <li>Bites or lacerations from fish, crustaceans, seals, sharks or other large marine animals during abalone diving, salvage or sampling</li> <li>Handling dangerous marine life and marine animals with stingers without proper identification or procedures</li> </ul>	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Increased risk of marine life interaction in areas with baiting, fishing, aquaculture or waste discharges</li> <li>Biological contamination from marine organisms, biofouling, pathogens or decomposing material encountered during salvage operations</li> <li>Allergic reactions or anaphylaxis from stings, bites or contact with certain marine flora and fauna</li> <li>Lack of clear protocols for deterring or aborting work when potentially aggressive marine life are present</li> </ul>		[REDACTED]	
9. Confined, Overhead & Under-Structure Diving (Wharves, Jetties, Piles)	<ul style="list-style-type: none"> <li>Entrapment or entanglement under jetties, in pile clusters or in confined compartments with limited access</li> <li>Loss of orientation or silt-out during grouting under jetties or salvage in confined spaces leading to panic or gas over-consumption</li> <li>Inadequate emergency retrieval options for divers working in overhead environments or inside structures</li> <li>Structural instability or collapse of deteriorated piles, wall elements or salvage targets above divers</li> <li>Umbilical snagging on protrusions, grouting hoses, debris or structural elements</li> <li>Limited communication or line-of-sight between diver and tender in confined channels or under-structure environments</li> <li>Insufficient assessment of atmospheric contaminants in partially enclosed spaces connected to the water</li> </ul>	4A	[REDACTED]	2M
10. Task-Specific Underwater Operations (Abalone, Salvage, Grouting, Sampling)	<ul style="list-style-type: none"> <li>High-frequency, repetitive abalone diving leading to cumulative fatigue, decompression stress and increased risk-taking</li> </ul>	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Uncontrolled lifting, rigging or movement of heavy items during marine salvage operations</li> <li>Pressurised grout lines and hoses under jetties posing hydraulic injection, hose whip or sudden movement hazards</li> <li>Damage to sensitive marine habitats during marine biology sampling or salvage activities</li> <li>Use of sharp tools, cutting equipment and sampling devices in proximity to diver body and umbilicals</li> <li>Lack of standardised methods for specimen handling, labelling and storage during marine biology sampling underwater</li> <li>Task-driven focus causing divers to ignore environmental changes or early symptoms of illness</li> </ul>		[REDACTED]	
11. Communications, Monitoring & Supervision of Diving Operations	<ul style="list-style-type: none"> <li>Inadequate real-time communication between diver, tender, Diving Supervisor and vessel master</li> <li>Lack of clear authority for halting operations when unsafe conditions arise</li> <li>Insufficient surface monitoring of dive profiles, environmental conditions and diver locations</li> <li>Information loss and miscommunication during handovers between shifts or supervisors</li> <li>No formal process for briefing and debriefing dive teams, leading to repeated errors or missed learnings</li> <li>Inadequate supervision of inexperienced or trainee divers during complex underwater work</li> <li>Failure of communications systems without predefined backup or abort procedures</li> </ul>	3H	[REDACTED]	1L

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12. Fatigue, Workload, Rostering & Psychosocial Risks	<ul style="list-style-type: none"> <li>Extended working hours, travel and repeated dives resulting in cumulative fatigue and reduced situational awareness</li> <li>Commercial pressure to meet abalone quotas, salvage deadlines or project milestones leading to risk-taking</li> <li>Insufficient rest and recovery following physically demanding dives in cold water or strong currents</li> <li>Stress, anxiety or mental health impacts from high-risk diving, remote work or traumatic incidents (e.g. serious injuries, fatalities, near drownings)</li> <li>Inadequate management of isolation for remote diving camps or long-duration offshore work</li> <li>Poor communication culture where divers feel unable to report fatigue or psychosocial concerns</li> </ul>	3H	[REDACTED]	2M
13. Emergency Preparedness, Medical Response & Rescue Capability	<ul style="list-style-type: none"> <li>Inadequate planning and resources for diver rescue in emergencies such as entrapment, unconsciousness, gas failure or marine life attack</li> <li>Lack of oxygen administration equipment and trained personnel on site</li> <li>Delayed activation of emergency services or recompression chamber due to unclear procedures or communication failures</li> <li>Insufficient rehearsal of emergency scenarios relevant to abalone diving, grouting under jetties, marine salvage and confined area diving</li> <li>Inadequate management of contaminated diver retrieval and decontamination procedures</li> <li>Missing or outdated emergency contact lists, site plans and evacuation routes</li> </ul>	4A	[REDACTED]	2M
14. Incident Reporting, Investigation, Audit &	<ul style="list-style-type: none"> <li>Under-reporting of incidents, near misses and unsafe conditions in diving and underwater work</li> </ul>	3H	[REDACTED]	1L

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Continuous Improvement	<ul style="list-style-type: none"> <li>Failure to identify root causes of systemic issues such as inadequate training, supervision, or equipment maintenance</li> <li>Lack of follow-through on corrective and preventive actions identified after diving incidents</li> <li>Absence of regular internal and external audits of the Diving Safety Management System</li> <li>Limited sharing of lessons learned across different dive teams, projects and disciplines (abalone, salvage, sampling, construction)</li> <li>Data not used to track trends in decompression illness, marine life injuries, equipment failures or fatigue-related issues</li> </ul>		[REDACTED]	
15. Documentation, Records, Permits & Interface with Other Systems	<ul style="list-style-type: none"> <li>Incomplete or inaccurate dive logs, exposure records and medical clearances</li> <li>Missing or invalid permits to work for activities such as hot work, confined space entry or lifting operations occurring concurrently with diving</li> <li>Poor integration of diving records with broader organisational WHS, quality and environmental systems</li> <li>Loss or unauthorised modification of critical documents such as decompression tables, emergency plans and procedures</li> <li>Failure to capture client requirements, marine park permits or fisheries regulations relevant to abalone and scientific sampling</li> <li>Difficulty demonstrating compliance to regulators due to poor record-keeping</li> </ul>	2M	[REDACTED]	1L

**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/laws-and-compliance/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.