

**General Painting Surface Prep Decorating**

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.	<b>Administrative</b> Change	
								<b>PPE</b>	

  

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 before task starts. 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, Planning and Legislative Compliance	<ul style="list-style-type: none"> <li>Lack of documented WHS management plan for painting and decorating operations</li> <li>Failure to align procedures with WHS Act 2011 and WHS Regulations</li> <li>Inadequate consultation with workers and health and safety representatives on WHS issues</li> <li>Poor integration of subcontractor and labour-hire workers into principal contractor WHS systems</li> <li>Absence of clear responsibilities for officers, PCBUs, supervisors and workers regarding painting activities</li> <li>Inadequate due diligence by officers in monitoring WHS performance related to painting and surface preparation</li> <li>Failure to manage overlapping duties with other PCBUs on multi-contractor sites</li> <li>Insufficient planning for high-risk construction work components (e.g. working at heights, use of powered plant, confined spaces)</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop and implement a documented WHS management plan specific to painting, surface preparation and decorating activities, aligned with the WHS Act 2011 and relevant WHS Regulations, Codes of Practice and Australian Standards</li> <li>Define and document WHS roles, responsibilities and accountabilities for officers, managers, supervisors, leading hands and workers involved in painting operations</li> <li>Establish a formal WHS consultation procedure, including toolbox talks, safety committee meetings and mechanisms to capture worker feedback on painting-related risks and controls</li> <li>Implement a pre-start project WHS planning process for painting works, including risk assessment, resource allocation, sequencing with other trades, and site-specific conditions (internal, external, heights, solvents)</li> <li>Develop and maintain procedures for managing overlapping duties with other PCBUs, including documented coordination meetings, shared risk registers and clear communication protocols</li> <li>Ensure officers undertake due diligence activities such as periodic WHS audits of painting projects, review of incident data, and verification of implementation of critical controls</li> <li>Integrate subcontractor and labour-hire personnel into the organisation's WHS management system through qualification, contract clauses, and mandatory adherence to site WHS rules</li> <li>Establish a management-of-change process for significant alterations to paint systems, work methods, products (e.g. new flame retardants, anti-graffiti coatings) or plant, ensuring WHS risks are reassessed before implementation</li> </ul>	3H
2. Competency, Licensing, Supervision and Training	<ul style="list-style-type: none"> <li>Workers undertaking advanced painting tasks without appropriate trade qualification or verified competency</li> <li>Insufficient training in handling and applying solvent-based paints, volatile coatings, flame retardants, undercoats and anti-graffiti products</li> <li>Lack of competency in use of access equipment for painting in high places (scaffolds, EWP, ladders, trestles)</li> <li>Poor understanding of health risks from isocyanates, solvents and silica or dust generated from sanding and surface preparation</li> <li>Inadequate supervision of apprentices, inexperienced painters and labourers</li> </ul>	4A	<ul style="list-style-type: none"> <li>Implement a competency-based training and verification system for all painters, decorators and surface preparation workers, including evidence of trade qualification or recognised prior learning</li> <li>Develop and deliver task-specific training modules on solvent-based coatings, flame retardants, volatile substances, anti-graffiti products, two-pack systems and specialised decorative finishes</li> <li>Ensure workers who operate elevated work platforms, scaffolds or other high-risk plant hold relevant high-risk work licences or formal training certificates as required by WHS legislation</li> <li>Provide health risk awareness training covering chemical exposure (solvents, isocyanates, heavy metals), dusts from sanding, noise, manual handling and psychosocial risks</li> <li>Mandate documented supervision plans for apprentices and inexperienced workers, with clearly identified supervisors and frequency of on-the-job competency checks</li> <li>Use a structured site-specific WHS induction checklist for painting projects that addresses internal and external painting, high places, public interface, vehicles, and weather impacts</li> <li>Maintain a training matrix that records expiry dates for licences, VOCs (verification of competency) and refresher training for key risk areas such as working at height and hazardous chemicals</li> </ul>	2M

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	<p>performing surface preparation, caulking and filling</p> <ul style="list-style-type: none"> <li>No structured induction covering site-specific hazards such as exterior work at heights, weather exposure and nearby public interfaces</li> <li>Failure to maintain current high-risk work licences (e.g. EWP) where applicable</li> <li>Gaps in training for emergency response, spill management and fire response during painting and surface treatment tasks</li> </ul>		<ul style="list-style-type: none"> <li>Conduct periodic competency assessments and observation-based verifications of safe work practices for surface preparation, spray application, hand painting and clean-up activities</li> </ul>	
3. Hazardous Chemicals and Coatings Management	<ul style="list-style-type: none"> <li>Inadequate chemical inventory and register for paints, primers, sealants, caulks, solvents, flame retardants and anti-graffiti coatings</li> <li>Missing or outdated Safety Data Sheets (SDS) for paints and surface treatment products</li> <li>Uncontrolled use of products containing isocyanates, flammable solvents, corrosives or respiratory sensitisers</li> <li>Use of incompatible products that can generate hazardous vapours, off-gassing or poor bonding</li> <li>Poor decanting and mixing practices leading to spills, exposures and poor build-up</li> <li>Lack of formal approval process before introducing new paints, fillers or treatment systems</li> <li>Insufficient information for workers on safe handling, storage, PPE and first aid for specific coatings and thinners</li> <li>Failure to manage residual lead-based or other legacy coatings during sanding, stripping or surface preparation</li> </ul>	4A	<ul style="list-style-type: none"> <li>Maintain a current hazardous chemicals register that lists all paints, solvents, fillers, flame retardants, anti-graffiti products and surface preparation chemicals used across projects</li> <li>Ensure up-to-date SDS (within 5 years, Australian-compliant) are readily accessible on site in both digital and hard copy formats for all products</li> <li>Implement a chemical approval process that requires WHS review of SDS and risk assessment before any new product or coating system is introduced onto site</li> <li>Standardise preferred product lists prioritising low-VOC, water-based and less hazardous alternatives where reasonably practicable, including safer options for undercoats, sealants and decorative finishes</li> <li>Develop and enforce documented procedures for mixing, decanting and thinning paints and coatings, including use of designated mixing areas with adequate ventilation and spill controls</li> <li>Provide clear labelling systems for all decanted containers and ensure no unlabelled containers are used or stored</li> <li>Implement specific controls and procedures for disturbance of lead-based or other hazardous legacy coatings, including engagement of competent persons, specific PPE and containment measures</li> <li>Provide documented worker instruction on chemical hazards, correct PPE selection, safe storage, segregation of incompatibles and emergency response for exposures and spills</li> </ul>	2M
4. Storage, Transport and Handling of Paints and Solvents	<ul style="list-style-type: none"> <li>Improper storage of flammable or combustible paints, thinners and solvents leading to fire or explosion risk</li> </ul>	3H		2M

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	<ul style="list-style-type: none"> <li>Inadequate segregation between incompatible substances (oxidisers, acids, flammables)</li> <li>Use of non-compliant storage cabinets or makeshift storage areas in site sheds or vehicles</li> <li>Unsecured loads of paint tins, gas cylinders or equipment during transport to and from sites</li> <li>Lack of spill containment for bulk or multiple small containers of coatings and volatile substances</li> <li>Poor manual handling systems for repetitive lifting and carrying of paint drums, ladders, tools and surface preparation equipment</li> <li>Inadequate ventilation in storage areas leading to build-up of vapours</li> <li>No documented system for disposing of out-of-date or deteriorated products</li> </ul>		[REDACTED]	
5. Ventilation, Exposure Control and Indoor Air Quality	<ul style="list-style-type: none"> <li>Inadequate ventilation during interior painting, priming, sanding and sealing with solvent-based decorative products</li> <li>Accumulation of flammable vapour from primers, thinners, top coats and flame retardants</li> <li>Prolonged inhalation exposure to solvent vapours, mists and sanding dusts in enclosed or poorly ventilated areas</li> <li>Insufficient management of recirculated air in HVAC systems during interior painting and decorating</li> <li>Failure to consider vulnerable building occupants (children, elderly, health-compromised persons) when scheduling interior painting works</li> <li>Odour complaints and potential health impacts on other workers or building</li> </ul>	4A	[REDACTED]	2M

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	occupants due to inadequate exposure control		[REDACTED]	
6. Working at Heights and Access Systems for Painting	<ul style="list-style-type: none"> <li>• Systemic failure to identify and control height-related risks for exterior painting, painting in high places, blinds and awnings, and high interior walls or ceilings</li> <li>• Inadequate selection and design of access systems (ladders, trestles, scaffolds, EWP) for surface preparation, priming and finishing</li> <li>• Lack of inspection and maintenance systems for scaffolding, trestle platforms, mobile towers and EWPs</li> <li>• Poor planning for edge protection and fall prevention when painting roofs, facades and elevated trim</li> <li>• Inadequate controls for working adjacent to unprotected edges, fragile roofing, and penetrations while carrying painting tools and materials</li> <li>• Insufficient exclusion zones and traffic management under elevated work platforms or scaffolds where painting is being undertaken</li> </ul>	4A	[REDACTED]	2M
7. Plant, Tools and Equipment Management	<ul style="list-style-type: none"> <li>• Inadequate maintenance and inspection of powered sanders, grinders, spray equipment and pressure pots</li> <li>• Use of defective or non-compliant hand tools, extension leads and portable RCD protection</li> <li>• Lack of standardisation and guarding for mechanical equipment used in surface preparation (e.g. dust extraction sanders)</li> </ul>	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>• Improper setup and maintenance of spray booths, extraction fans and filtration units where used</li> <li>• Use of makeshift equipment for feathering, surface preparation or access that does not meet design standards</li> <li>• Failure to control electrical risks associated with portable equipment in damp exterior conditions or on conductive surfaces</li> </ul>		[REDACTED]	
8. Hazardous Dusts, Surface Preparation and Legacy Materials	<ul style="list-style-type: none"> <li>• Uncontrolled generation of sanding dusts during surface preparation of walls, ceilings, trims, doors, fences and exterior surfaces</li> <li>• Disturbance of legacy coatings such as lead-based paint or asbestos-containing materials during scraping, sanding or surface treatments</li> <li>• Lack of systems for dust containment when feathering paint on blinds, awnings, exterior window sashes</li> <li>• Inadequate assessment of substrates before surface preparation, leading to exposure to unknown hazardous materials</li> <li>• Inadequate cleaning systems post-sanding leading to residual dust affecting other trades and building occupants</li> <li>• Failure to manage waste streams associated with hazardous dusts and spent abrasives</li> </ul>	4A	[REDACTED]	2M
9. Fire, Explosion and Hot Work Interface	<ul style="list-style-type: none"> <li>• Use of flammable and combustible paints, primers, thinners and volatile substances near ignition sources</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Inadequate separation between painting activities and hot work (welding, grinding, cutting) carried out by other trades</li> <li>Static build-up or poor earthing during spray application of solvent-based coatings</li> <li>Improper storage of rags, brushes and materials saturated with flammable coatings and solvents, creating self-heating and spontaneous combustion risk</li> <li>Failure to consider fire load increase associated with bulk storage of coatings and packaging on site</li> <li>Insufficient fire extinguishers and lack of worker training in their use in painting work areas</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>	
10. Environmental and Weather Management for Exterior Works	<ul style="list-style-type: none"> <li>Failure to consider weather impacts on exterior painting or priming including unsafe surfaces (wet, slippery) and degraded coating performance</li> <li>Uncontrolled overspray, runoff of paints, primers and anti-graffiti coatings to neighbouring properties, vehicles, gardens and waterways</li> <li>Work scheduling during extreme heat, cold or high winds contributing to heat stress, cold stress or loss of control of materials and equipment</li> <li>Inadequate stormwater protection for wash water, paint residues and cleaning chemicals</li> <li>Lack of planning for safe work during sudden weather changes while on ladders, scaffolds or roofs</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>Environmental non-compliance affecting reputation and potential regulatory enforcement</li> </ul>		[REDACTED]	
11. Public, Occupant and Third-Party Safety	<ul style="list-style-type: none"> <li>Inadequate separation between painting activities and members of the public in residential, commercial or public spaces</li> <li>Lack of traffic and pedestrian management around exterior painting of façades, fences, awnings and exterior walls</li> <li>Uncontrolled access to areas where wet paint, decorative finishes or anti-graffiti coatings are curing, causing slip, contact or inhalation risks</li> <li>Insufficient communication with building occupants regarding temporary loss of access, odours and re-entry times after internal painting</li> <li>Potential exposure of children and vulnerable persons to sanding dusts, solvent vapours or residual coatings</li> <li>Inadequate signage and barriers for work areas during cleaning after paint jobs, including use of wet chemicals</li> </ul>	3H	[REDACTED]	2M
12. Manual Handling, Ergonomics and Fatigue Management	<ul style="list-style-type: none"> <li>Repetitive and sustained awkward postures associated with overhead painting, cutting-in edges, and sanding walls and ceilings</li> <li>Manual handling risks from lifting, carrying and manoeuvring paint containers, extension poles, ladders and surface preparation equipment</li> <li>Poor planning of work sequencing leading to extended periods of high-intensity work without adequate breaks</li> </ul>	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Lack of systems for managing fatigue, especially during long shifts, weekend work or tight project deadlines</li> <li>Insufficient ergonomic design of tools and equipment affecting long-term musculoskeletal health of painters</li> <li>No formal process to identify and manage workers with pre-existing musculoskeletal conditions</li> </ul>		[REDACTED]	
13. Personal Protective Equipment (PPE) Program Management	<ul style="list-style-type: none"> <li>Over-reliance on PPE as a primary control for chemical exposure, dusts and noise rather than as part of a hierarchy of control</li> <li>Inconsistent provision, selection and fit of respiratory protective equipment for solvent vapours, isocyanates and sanding dusts</li> <li>No formal PPE issue, maintenance and replacement system for gloves, eye protection, coveralls and footwear</li> <li>Failure to manage facial hair and fit-testing requirements for tight fitting respirators</li> <li>Lack of cleaning and storage systems for reusable PPE, leading to contamination and reduced effectiveness</li> <li>Workers not trained in the limitations and correct use of PPE for specialised coatings and surface treatments</li> </ul>	3H	[REDACTED]	1L
14. Incident Reporting, Health Monitoring and Continuous Improvement	<ul style="list-style-type: none"> <li>Under-reporting of near misses, minor incidents and exposure events related to painting and surface preparation</li> <li>Lack of structured investigation of incidents involving chemicals, falls from height, equipment failures or public exposure</li> <li>No targeted health monitoring for workers exposed to particular hazardous</li> </ul>	3H	[REDACTED]	1L

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	<p>chemicals (e.g. isocyanates, certain solvents or heavy metals)</p> <ul style="list-style-type: none"> <li>• Poor data capture, trend analysis and feedback of lessons learned into procedures and training</li> <li>• Inadequate liaison with occupational health providers regarding painting-specific health risks</li> <li>• Failure to review and update risk assessments and control measures following incidents or significant changes in work practices</li> </ul>		[REDACTED]	
15. Contractor, Labour-Hire and Supply Chain Management	<ul style="list-style-type: none"> <li>• Inconsistent WHS standards between principal contractor, painting subcontractors and labour-hire workers</li> <li>• Use of unvetted subcontractors for specialised tasks such as flame retardant application, anti-graffiti coatings or decorative finishes</li> <li>• Poor coordination of work sequence with other trades leading to congestion, overlapping tasks and increased risk of incidents</li> <li>• Inadequate communication of WHS expectations to suppliers delivering paints, scaffolding or plant to site</li> <li>• Failure to verify that subcontractor SWMS and procedures address key system risks in painting and surface preparation</li> <li>• Lack of monitoring and enforcement of contractual WHS requirements for painting-related services</li> </ul>	3H	[REDACTED]	2M

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SAMPLE

**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.