

**Paints and Coatings Water Based**

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 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. Governance, WHS Duties and PCBU Oversight	<ul style="list-style-type: none"> <li>Lack of clear allocation of WHS duties for management of water based paints and coatings under WHS Act 2011 (PCBU, Officers and Worker obligations)</li> <li>Inadequate WHS policy framework for the procurement, storage, use and disposal of water based paints and coatings</li> <li>Insufficient due diligence by Officers to ensure resources and processes are in place to manage chemical risks</li> <li>Failure to consult, cooperate and coordinate with other duty holders (e.g. contractors, suppliers, building managers) regarding paint and coating risks</li> <li>Absence of formal WHS objectives, targets and performance indicators relating to hazardous chemicals</li> </ul>	High	<ul style="list-style-type: none"> <li>Establish and endorse a WHS Governance Framework that explicitly references hazardous chemicals management, including water based paints and coatings, in line with WHS Act 2011 and WHS Regulations 2011</li> <li>Define and document WHS roles, responsibilities and accountabilities for PCBUs, Officers, managers, supervisors and workers in relation to the lifecycle of water based paints and coatings (procurement, storage, use, waste and emergency response)</li> <li>Implement an Officer due diligence program (e.g. WHS lead briefings, quarterly WHS performance reviews, site walk-throughs) focusing on hazardous chemicals and ensuring adequate resources are provided</li> <li>Develop and maintain a WHS Policy and supporting Chemical Management Procedure that specifically addresses water based paints and coatings including risk management expectations and consultation requirements</li> <li>Set measurable WHS KPIs relating to chemical management (e.g. percentage of current Safety Data Sheets available, percentage of workers trained, incident and near miss trends) and review them at senior management meetings</li> <li>Establish documented arrangements for consultation, cooperation and coordination with other duty holders who may introduce or be affected by paints and coatings (e.g. formal contractor management processes, shared-tenancy WHS forums)</li> <li>Ensure WHS risk management for chemicals is integrated into broader business planning, change management and project governance processes</li> </ul>	Medium
2. Procurement and Supply Chain Management	<ul style="list-style-type: none"> <li>Uncontrolled procurement of water based paints and coatings without WHS review (e.g. online procurement, ad hoc purchases by workers)</li> <li>Selection of products with unnecessary health or environmental impacts when safer alternatives exist</li> <li>Failure to obtain or review up-to-date Safety Data Sheets (SDS) prior to purchase and introduction to site</li> <li>Inadequate supplier vetting leading to incomplete or inaccurate chemical information</li> <li>Poor visibility of the total hazardous chemical inventory across business units or sites</li> </ul>	High	<ul style="list-style-type: none"> <li>Implement a centralised procurement procedure for all paints and coatings that mandates WHS review and approval before purchase, including evaluation of hazard classifications</li> <li>Adopt a substitution policy requiring assessment and, where reasonably practicable, selection of lower hazard water based products (e.g. low VOC, low sensitiser content) while maintaining required performance</li> <li>Require suppliers to provide current SDS compliant with Australian requirements (within 5 years) as a condition of purchase, and link these into the organisation's chemical register before products are released for use</li> <li>Develop and use a pre-qualification process for chemical suppliers that assesses WHS compliance, SDS quality, technical support and ability to provide training or guidance</li> <li>Integrate WHS chemical risk criteria into purchasing systems (e.g. approved product lists, blocked high-risk substances, mandatory WHS approver in the ordering workflow)</li> <li>Maintain a centralised, version-controlled list of approved water based paints and coatings, including permitted uses, storage requirements and disposal considerations</li> <li>Periodically review the chemical portfolio to rationalise the range of products, favour safer alternatives and remove legacy or unnecessary items from procurement catalogues</li> </ul>	Low

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3. Chemical Identification, SDS Management and Register Control	<ul style="list-style-type: none"> <li>Incomplete or outdated chemical register for water based paints and coatings</li> <li>Lack of ready access to SDS at points of use and in emergencies</li> <li>Use of unlabelled or decanted containers without appropriate hazard information</li> <li>Failure to identify hazardous ingredients within water based formulations (e.g. isocyanates, biocides, sensitisers)</li> <li>Inconsistent naming and coding of products across sites leading to confusion and misuse</li> </ul>	High	<ul style="list-style-type: none"> <li>Establish and maintain a hazardous chemicals register that specifically lists all water based paints and coatings on site, including product names, suppliers, locations, quantities and SDS links</li> <li>Implement a SDS management system (electronic and/or hardcopy) to ensure all SDS are current (less than 5 years old), easily accessible to workers and attached to the relevant register entries</li> <li>Develop a decanting and labelling procedure that mandates compliant workplace labels on any secondary containers, referencing product name, hazards and precautions, and prohibits storage in food or drink containers</li> <li>Conduct periodic audits of stores, rooms, workshops and vehicles to verify that all paints and coatings are listed in the register, appropriately labelled and cross checked against SDS holdings</li> <li>Standardise product names and coding across all business units and sites, and ensure procurement, inventory and WHS records use the same identifiers</li> <li>Include specific guidance in the Chemical Management Procedure on interpretation of SDS for water based products, with emphasis on chronic hazards and mixed exposures</li> <li>Ensure that emergency response documentation (e.g. spill response plans, first aid instructions) is aligned with SDS information and made visible in relevant work areas</li> </ul>	Medium
4. Risk Management Framework and Change Management	<ul style="list-style-type: none"> <li>Absence of a systematic risk assessment process for water based paints and coatings at a system and organisational level</li> <li>Inadequate review of WHS risks when introducing new painting systems, application techniques or materials</li> <li>Failure to consider cumulative exposure from multiple tasks, products and work locations</li> <li>Unmanaged changes to workload, staffing, or process design that increase exposure durations or frequencies</li> <li>Risk assessments focused only on acute effects, ignoring sensitisation, respiratory and long-term health impacts</li> </ul>	High	<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>	Medium
5. Storage, Segregation and Inventory Management Systems	<ul style="list-style-type: none"> <li>Inadequate storage design for water based paints and coatings, resulting in leaks, spills or container deterioration</li> </ul>	High	<p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<ul style="list-style-type: none"> <li>Excessive quantities held on site, increasing fire load and spill potential</li> <li>Poor segregation from incompatible substances (e.g. strong oxidisers, flammable solvents, food products)</li> <li>Uncontrolled storage in vehicles, temporary work areas or public-access spaces</li> <li>Insufficient ventilation in storage areas leading to build-up of vapours and odours</li> </ul>		[REDACTED]	
6. Ventilation, Engineering Controls and Workplace Design	<ul style="list-style-type: none"> <li>Insufficient general and local exhaust ventilation in areas where water based paints and coatings are mixed or applied, leading to build-up of mists and vapours</li> <li>Inadequate workplace design causing overspray drift into adjacent work areas or public spaces</li> <li>Reliance on natural ventilation only, without verification that exposure standards can be consistently met</li> <li>Poor layout of equipment and storage that requires manual handling of heavy containers over long distances</li> <li>Inadequate maintenance and testing of installed engineering controls such as spray booths and extraction systems</li> </ul>	High	[REDACTED]	Medium

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7. Training, Competency and Supervision Systems	<ul style="list-style-type: none"> <li>Workers and supervisors not adequately trained in the health and safety risks of water based paints and coatings, assuming they are harmless due to being 'water based'</li> <li>Lack of competency in interpreting SDS and risk assessments, leading to incorrect use of controls or PPE</li> <li>Inconsistent on-the-job instruction and informal practices overriding formal procedures</li> <li>Insufficient supervision of inexperienced workers, contractors or apprentices using paints and coatings</li> <li>Failure to provide refresher training and updates when products or processes change</li> </ul>	High	[REDACTED]	Medium
8. Personal Protective Equipment (PPE) Management	<ul style="list-style-type: none"> <li>Over-reliance on PPE as the primary control for exposure to water based paints and coatings</li> <li>Selection of unsuitable PPE (e.g. incorrect glove material, poor-fitting respiratory protection)</li> <li>Inconsistent PPE use due to comfort, availability or cultural issues</li> <li>Inadequate systems for inspection, replacement, cleaning and storage of PPE</li> <li>Lack of fit testing and training for tight-fitting respirators where used</li> </ul>	Medium	[REDACTED]	Low

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9. Health Monitoring, Exposure Assessment and Worker Wellbeing	<ul style="list-style-type: none"> <li>Undetected respiratory sensitisation, dermatitis or other health effects due to chronic low-level exposure to water based paints and additives</li> <li>Failure to identify workers with pre-existing conditions that may be aggravated by exposure</li> <li>Lack of objective data on exposure levels (e.g. airborne mists, vapours, skin exposure) to inform risk controls</li> <li>Stigma or under-reporting of early symptoms by workers due to job security or cultural factors</li> <li>Psychosocial stress arising from odours, perceived chemical exposure or poorly managed health concerns</li> </ul>	Medium	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Low
10. Contractor, Subcontractor and Third-Party Management	<ul style="list-style-type: none"> <li>Contractors introducing new products, paints and coatings onto site without WHS review</li> <li>Inconsistent application of the organisation's chemical management standards by external parties</li> <li>Poor coordination between multiple duty holders leading to overlapping chemical exposures and incompatible controls</li> <li>Inadequate verification of contractor competency in managing chemical risks</li> <li>Gaps in communication about residual chemical hazards to building owners, tenants or downstream users after works are completed</li> </ul>	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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			[REDACTED]	
11. Incident, Spill and Emergency Management Systems	<ul style="list-style-type: none"> <li>• Uncoordinated response to spills or accidental releases of water based paints and coatings</li> <li>• Lack of clarity about when and how to escalate incidents involving chemical exposure or environmental contamination</li> <li>• Inadequate spill response equipment or poorly positioned resources</li> <li>• Incomplete reporting of near misses and minor events, leading to repeated failures</li> <li>• Poor integration of chemical incident into broader emergency plans (e.g. evacuation, fire response)</li> </ul>	High	[REDACTED]	Medium
12. Environmental Management and Waste Disposal Systems	<ul style="list-style-type: none"> <li>• Improper disposal of surplus water based paints and coatings to stormwater or sewer, causing environmental harm and regulatory non-compliance</li> <li>• Lack of systems for segregation and disposal of contaminated absorbents, rags and containers</li> <li>• Insufficient control of washing and cleaning processes (e.g. equipment wash-down) leading to uncontrolled discharges</li> <li>• Inadequate understanding of local authority and trade waste requirements for paint residues and wash water</li> <li>• Untracked movement and storage of waste paints and containers, increasing risk of leaks and exposure</li> </ul>	Medium	[REDACTED]	Low

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			[REDACTED]	
13. Monitoring, Audit, Review and Continuous Improvement	<ul style="list-style-type: none"> <li>• Controls for water based paints and coatings degrading over time due to complacency, cost-cutting or organisational change</li> <li>• Lack of systematic verification that procedures and controls are implemented and effective</li> <li>• Failure to learn from incidents, near misses, complaints or regulatory changes</li> <li>• Outdated risk assessments, training content and procurement rules that no longer reflect actual operations or products used</li> <li>• Fragmented data on safety-related performance preventing informed decision-making</li> </ul>	Medium	[REDACTED]	Low

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.