

Scrap Metal Recycling

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, Duties and Legal Compliance	<ul style="list-style-type: none"> <li>Unclear allocation of WHS duties under WHS Act 2011 leading to gaps in accountability for scrap metal operations</li> <li>Directors and officers not exercising due diligence to ensure WHS systems are resourced and verified</li> <li>Absence of a documented WHS management system aligned to ISO 45001 or equivalent</li> <li>Inadequate consultation arrangements with workers, contractors and Health and Safety Representatives (HSRs)</li> <li>Failure to maintain and review WHS policies and procedures specific to scrap metal recycling activities</li> <li>Non-compliance with licensing, permits and environmental requirements relevant to scrap metal storage, processing and transport</li> </ul>	4A	<ul style="list-style-type: none"> <li>Establish and implement a documented WHS Management System that explicitly references WHS Act 2011 and WHS Regulation, with particular focus on scrap metal recycling risks (compression, dismantling, collection, sorting, separation)</li> <li>Define and document WHS roles, responsibilities and due diligence requirements for officers, line managers, supervisors and workers across all scrap metal operations</li> <li>Develop a WHS legal register covering applicable WHS, dangerous goods, plant, electrical safety and environmental legislation and ensure annual review by a competent person</li> <li>Implement formal worker consultation and participation processes, including election and training of HSRs and regular WHS committee meetings with minutes and action tracking</li> <li>Undertake annual WHS system audits (internal or external) and implement corrective actions with clear accountability and timeframes</li> <li>Ensure management receives periodic WHS performance reports (KPIs, incidents, audit findings, corrective actions) to support informed decision-making and resource allocation</li> </ul>	3H
2. Site Layout, Traffic Management and Mobile Plant Interaction	<ul style="list-style-type: none"> <li>Poorly designed yard layout causing interaction between pedestrians, forklifts, loaders, cranes and scrap bins</li> <li>Lack of formal traffic management plan for scrap collection, shipping and customer deliveries</li> <li>Uncontrolled reversing of trucks and mobile plant during loading and unloading of scrap metals and trailers</li> <li>Inadequate segregation of zones for compressing scrap metal, dismantling trailers and manual sorting areas</li> <li>Insufficient lighting in loading, unloading and scrap sorting zones, particularly for early morning or night operations</li> <li>No system for authorising and managing external transport operators and contractors on site</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop and implement a documented Traffic Management Plan that includes one-way traffic flows, designated plant routes and exclusion zones around compression and dismantling areas</li> <li>Designate and signpost separate pedestrian walkways, crossings and access control points, with physical barriers where reasonably practicable</li> <li>Implement documented procedures for vehicle entry, induction, loading and unloading, including spotter requirements and restricted zones</li> <li>Use engineered controls such as boom gates, bollards, handrails and guard rails to separate pedestrians from mobile plant and scrap stockpiles</li> <li>Ensure adequate fixed and task lighting is installed and periodically inspected in all operational areas, particularly where manual sorting or separation of metals is undertaken</li> <li>Introduce contractor management procedures requiring transport providers and mobile plant hire companies to comply with site traffic rules and provide evidence of operator competency</li> </ul>	2M

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3. Plant and Equipment Safety (Compressors, Shears, Cranes and Hand Tools)	<ul style="list-style-type: none"> <li>Inadequate selection, design and guarding of scrap metal balers, shears and compactors</li> <li>Lack of plant registration, commissioning and verification for high-risk scrap metal processing machinery</li> <li>Failure of isolation and lockout systems during maintenance or clearing jams in compression or shearing equipment</li> <li>Uncontrolled use of cutting, grinding and oxy-acetylene equipment during dismantling of scrapped trailers</li> <li>Use of non-compliant lifting attachments, magnets, grabs or chains for handling heavy scrap and non-ferrous metals</li> <li>Inadequate inspection, tagging and maintenance of powered hand tools, hoses and lifting equipment</li> </ul>	4A	<ul style="list-style-type: none"> <li>Maintain a register of all plant used in scrap metal compression, dismantling and sorting, including risk assessments and maintenance history for each asset</li> <li>Ensure all fixed scrap processing equipment (e.g. shears, compactors) is designed, installed, guarded and interlocked in accordance with WHS regulation and relevant Australian Standards</li> <li>Implement formal lockout-tagout procedures for all plant, including mandatory isolation before clearing blockages, performing maintenance or accessing confined spaces within machinery</li> <li>Develop safe operating procedures (SOPs) for cutting, grinding and oxy-fuel equipment used in dismantling scrapped trailers with clear authorisation and supervision requirements</li> <li>Introduce a scheduled inspection and preventative maintenance program for cranes, forklifts, magnets, grabs, chains, shears and shackles, including third-party inspections where required</li> <li>Require procurement of only compliant plant and equipment from reputable suppliers and verify documentation such as test certificates, manuals and conformity statements before use</li> </ul>	2M
4. Hazardous Substances, Fumes and Contaminants in Scrap	<ul style="list-style-type: none"> <li>Presence of residual fuels, oils, refrigerants, LPG, batteries, air-bags and other hazardous materials in collected scrap</li> <li>Generation of welding, cutting and grinding fumes during dismantling of scrapped trailers and compression activities</li> <li>Exposure to lead, heavy metals and other contaminants in painted surfaces or legacy components within the scrap stream</li> <li>Inadequate identification, labelling and segregation of hazardous wastes removed from scrap (e.g. waste oil, asbestos-containing material, chemical residues)</li> <li>Lack of procedures for rejecting, quarantining or safely handling unknown or suspect scrap loads</li> <li>Inadequate ventilation and extraction in enclosed or semi-enclosed dismantling, sorting or compression areas</li> </ul>	4A	<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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5. Manual Handling, Ergonomics and Material Sorting Systems	<ul style="list-style-type: none"> <li>• High frequency manual sorting of scrap material and non-ferrous metals resulting in repetitive strain and musculoskeletal disorders</li> <li>• Poorly designed sorting lines, chutes and bins requiring awkward reaches, over-shoulder lifting or twisting</li> <li>• Manual handling of heavy or irregular scrap pieces where mechanical aids are not provided or available</li> <li>• Inadequate systems for rotation of workers performing intensive manual sorting tasks</li> <li>• Lack of assessment of cumulative manual handling loads across compression, dismantling and sorting tasks</li> <li>• No formal process for consulting workers on ergonomic issues in sorting and dismantling workstations</li> </ul>	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
6. Noise, Vibration and Environmental Conditions	<ul style="list-style-type: none"> <li>• Chronic exposure to high noise levels from compressors, shears, impact loading of scrap and movement operations</li> <li>• Exposure to whole-body and hand-arm vibration from mobile plant, grinders, cutters and other powered tools</li> <li>• Heat stress risk in outdoor yards particularly around metal compression areas and dismantling zones with limited shade</li> <li>• Poor dust control from processing, vehicle movements and manual sorting of fine scrap material</li> <li>• Inadequate monitoring of noise and vibration exposures across different work areas and shifts</li> <li>• Lack of long-term health surveillance for workers exposed to noise and vibration</li> </ul>	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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7. Contractor, Visitor and Customer Management	<ul style="list-style-type: none"> <li>Uncontrolled access of scrap suppliers, transport operators and customers into operational zones</li> <li>Contractors undertaking high-risk tasks such as plant maintenance, demolition cutting or electrical work without adequate supervision or system integration</li> <li>Inconsistent induction and competency verification for labour hire workers and subcontractors engaged in dismantling or sorting activities</li> <li>Poor communication of site rules, PPE requirements and traffic management arrangements to visitors and casual scrap drop-off customers</li> <li>Lack of defined responsibilities between the PCBU and contractors for shared plant and yard operations</li> <li>Inadequate monitoring of contractor WHS performance and incident reporting</li> </ul>	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
8. Competency, Training and Supervision	<ul style="list-style-type: none"> <li>Operators of compressors, shears, forklifts and cranes not formally assessed as competent</li> <li>Inadequate training in recognising hazards associated with scrap compression, trailer dismantling and manual sorting of sharp/unstable materials</li> <li>Limited supervision of new or young workers in high-risk tasks such as oxy-cutting or working around mobile plant</li> <li>No refresher training program to address skill fade or introduction of new technology or plant</li> <li>Inconsistent communication of procedures and changes to work methods across shifts and crews</li> <li>Language, literacy or cultural barriers impacting understanding of instructions and safety information</li> </ul>	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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9. Scrap Acceptance, Storage and Stockpile Management	<ul style="list-style-type: none"> <li>Uncontrolled acceptance of unsuitable or contaminated scrap loads introducing fire, explosion or chemical exposure risks</li> <li>Poorly managed scrap stockpiles creating instability, collapse and engulfment risks for workers and mobile plant</li> <li>Excessive accumulation of flammable materials such as tyres, plastics, fuels or contaminated rags within scrap piles</li> <li>Insufficient separation between incompatible materials (e.g. batteries, gas cylinders, combustible materials and ignition sources)</li> <li>Lack of documented criteria for maximum stockpile sizes, heights and separation distances</li> <li>Inadequate inspection regime for stockpiles, storage racks and bins used for non-ferrous metals and other high-value items</li> </ul>	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
10. Fire, Explosion and Hot Work Management	<ul style="list-style-type: none"> <li>Presence of fuel, oil, gas cylinders and pressurised vessels within scrap leading to fire or explosion during compression or cutting</li> <li>Uncontrolled hot work during dismantling of scrapped trailers or repair of plant in scrap processing area</li> <li>Accumulation of combustible dust, rags and packaging materials around plant and in scrap piles</li> <li>Inadequate fire detection, suppression and emergency response arrangements in processing and storage areas</li> <li>Lack of segregation between hot work areas and combustible or flammable materials</li> <li>Insufficient training of workers and supervisors in hot work permits and emergency fire response</li> </ul>	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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11. Incident Reporting, Investigation and Corrective Actions	<ul style="list-style-type: none"> <li>Under-reporting of injuries, near misses and plant damage incidents in scrap processing and sorting operations</li> <li>Inadequate investigation of serious incidents, fires or near misses involving mobile plant or hazardous scrap</li> <li>Lack of root cause analysis leading to repeat incidents in compression, dismantling and collection activities</li> <li>Poor tracking and closure of corrective actions identified from incidents, audits and inspections</li> <li>Failure to meet notifiable incident reporting obligations under WHS legislation</li> <li>Limited feedback to workers about incident learnings and implemented improvements</li> </ul>	3H	[REDACTED]	1L
12. Emergency Preparedness and Response	<ul style="list-style-type: none"> <li>Inadequate planning for fires, explosions, structural collapse or medical emergencies in scrap yards</li> <li>Poor coordination with emergency services for incidents involving hazardous materials within scrap</li> <li>Unclear roles and responsibilities for wardens, first aiders and incident controllers during emergencies</li> <li>Inaccessible or poorly maintained emergency equipment such as first aid kits, spill kits and rescue gear</li> <li>Insufficient consideration of after-hours operations, lone workers or remote scrap collection activities</li> <li>Lack of regular testing and review of emergency plans in response to operational changes</li> </ul>	3H	[REDACTED]	1L
13. Fatigue, Fitness for Work and Psychosocial Risks	<ul style="list-style-type: none"> <li>Long or irregular shifts for workers involved in scrap collection driving, plant operation and manual sorting</li> </ul>	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>High physical and mental demands associated with noisy, hot and fast-paced scrap processing environments</li> <li>Inadequate systems for identifying and managing workers affected by drugs, alcohol or other fitness for work issues</li> <li>Exposure to aggressive behaviour from members of the public or customers at scrap drop-off points</li> <li>Limited processes for managing work-related stress, bullying or conflict within multi-cultural workforces</li> <li>Insufficient consideration of fatigue risks when scheduling overtime, night shifts and maintenance shutdowns</li> </ul>		[REDACTED]	
14. Remote and Off-Site Scrap Collection Activities	<ul style="list-style-type: none"> <li>Collection crews working alone or in small teams at remote sites, farms or roadside locations with limited communications</li> <li>Inadequate journey management and route planning for heavy vehicles collecting scrap metal from multiple customers</li> <li>Lack of pre-assessment of off-site locations for hazards such as unstable ground, overhead power lines and unsegregated public access</li> <li>Poor integration of vehicle safety features, maintenance and constraint systems with WHS requirements</li> <li>Limited emergency response capability for incidents occurring away from the main yard</li> <li>Inconsistent application of client or principal contractor site rules and permit systems</li> </ul>	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/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.