

Spray Painting

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

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

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

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

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



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

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

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

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

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

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

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

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, Policy and Legislative Compliance	<ul style="list-style-type: none"> Absence of a documented WHS policy and spray painting specific procedures aligned with WHS Act 2011 and WHS Regulations Senior management not clearly accepting and documenting their primary duty of care and due diligence obligations for spray painting activities No formal process to identify, interpret and regularly review applicable Australian Standards, Codes of Practice and guidance (e.g. Safe Work Australia spray painting and powder coating code) Inadequate WHS objectives, targets and indicators specific to spray painting risks (flammable atmospheres, health surveillance, ventilation performance) Lack of consultation mechanisms with workers and Health and Safety Representatives (HSRs) on changes plant, chemicals, ventilation systems and work methods No formalised process for authorising new spray painting methods, coatings or equipment before use Poor integration of contractor activities into the organisation's WHS governance arrangements for spray painting work 	High	<ul style="list-style-type: none"> Develop, endorse and communicate a WHS policy that explicitly references spray painting risks, hazardous chemicals, airborne contaminants, flammable atmospheres and plant, in line with the WHS Act 2011 and WHS Regulations Document a governance structure that allocates WHS roles, responsibilities and authorities for spray painting, including PCBUs, officers, supervisors, HSRs, competent persons and contractors Establish and maintain a legal and standards register covering relevant WHS legislation, regulations, approved Codes of Practice and Australian Standards relating to spray painting, hazardous chemicals, ventilation, electrical equipment in hazardous areas and fire protection Implement an annual WHS compliance review for spray painting operations, including gap analysis against the WHS Act 2011, WHS Regulations and applicable Codes of Practice Embed a formal change management procedure so that any new product, process, plant or layout affecting spray painting (including temporary booths) is risk assessed, approved and documented prior to implementation Create a documented consultation procedure requiring engagement with workers and HSRs when developing or revising spray painting policies, risk assessments, emergency plans and PPE standards Ensure contractor management procedures require contractors performing spray painting or maintenance on spray booths to comply with the organisation's WHS management system, including provision of their risk assessments and licences Integrate spray painting risk controls, objectives and performance measures into the organisation's broader WHS Plan, with scheduled management review Maintain written records of officer due diligence activities relating to spray painting (briefings, inspections, investment decisions, training approvals) to demonstrate compliance 	Medium
2. Hazardous Chemicals and Product Stewardship	<ul style="list-style-type: none"> Use of hazardous chemicals (isocyanates, solvents, flammable liquids, toxic pigments) without systematic risk assessment Safety Data Sheets (SDS) not current, incomplete, inaccessible or not understood by workers Introduction of new paints, thinners or cleaning agents without prior WHS review Inadequate classification, labelling and decanting practices for spray painting products and waste 	High	<ul style="list-style-type: none"> Implement a hazardous chemicals management procedure specifically addressing procurement, approval, use, storage and disposal of spray paints, hardeners, thinners, cleaning agents and associated products Maintain an electronic and physical hazardous chemicals register for all spray painting substances, linked to up-to-date SDS (within 5 years) accessible to all workers at the point of use Introduce a chemical approval process where a competent person reviews SDS, identifies WHS risks (health, flammability, environmental) and documents control measures before products are purchased or trialed Adopt a hierarchy of control approach for chemical selection, prioritising substitution to lower hazard products (e.g. low VOC, isocyanate-free, water-borne systems) where reasonably practicable, with documented justification when higher hazard products are retained 	Medium

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	<ul style="list-style-type: none"> Bulk storage and handling systems for flammable and combustible liquids not designed or managed in accordance with applicable Australian Standards No formal substitution assessment to minimise use of high hazard chemicals such as isocyanates or high VOC solvents Inadequate controls to manage chemical incompatibilities (e.g. oxidisers and organic solvents) in storage and waste areas 		<ul style="list-style-type: none"> Standardise decanting, container labelling and small-pack storage procedures consistent with WHS Regulation and relevant Australian Standards, including prohibition of unlabelled containers Define and document storage design requirements for flammable liquids, including segregation distances, spill containment, ventilation, ignition source control and quantities per area, with periodic compliance audits Include chemical incompatibility rules in storage and waste procedures, supported by pictorial signage and training for storepersons and sprayers Integrate hazardous chemical information into toolbox talks and induction content, focusing on key risks such as isocyanate sensitisation, solvent narcosis and chronic health effects Set up a scheduled review program for all spray painting chemicals at least every two years to identify opportunities for safer alternatives and reduce overall chemical inventory 	
3. Ventilation, Spray Booth Design and Engineering Controls	<ul style="list-style-type: none"> Spray booths and spray areas not designed or installed to relevant standards, leading to inadequate contaminant capture and overspray control Poorly maintained or incorrectly balanced ventilation systems causing build-up of flammable vapours or hazardous airborne contaminants Lack of documented performance criteria (airflow rates, air changes, capture velocities) and acceptance testing for spray booths Extraction system exhausting contaminated air to locations affecting other workers or neighbouring properties Inadequate segregation between spray painting areas and ignition sources, office areas or public access routes Uncontrolled use of portable fans or heaters in spray areas creating ignition sources or disruptive airflows No system for verifying that engineering controls remain effective after modifications, filter changes or maintenance 	High	<ul style="list-style-type: none"> Develop engineering design and performance specifications for spray booths and spray areas in line with relevant Australian Standards and codes, including airflow rates, filtration efficiency, lighting and electrical classification requirements Require that all new or modified spray booths and ventilation systems are designed, installed and commissioned by competent persons, with documented commissioning reports and baseline performance data Implement a scheduled inspection, testing and maintenance program for spray booths and ventilation systems, including checks of airflow, pressure differentials, filter condition, fan operation and interlocks, with records retained Establish written performance criteria (e.g. minimum face velocity, maximum overspray levels, flammable vapour limits) and trigger points for immediate shutdown and rectification Design and document segregation controls to separate spray painting operations from other work areas, including physical barriers, controlled access doors, airlocks and zoning Prohibit unauthorised portable fans, heaters and other airflow-altering devices in or near spray areas through documented procedures and supervision, with alternative engineered solutions for thermal comfort where required Ensure exhaust discharge points and ducting layouts are reviewed by a competent person to minimise recirculation, protect other workers and avoid environmental nuisance complaints Include verification of engineering controls in change management and post-maintenance checks, with sign-off by a competent person before resuming normal operations Incorporate regular independent audits or third-party inspections of ventilation performance for high-risk spray painting operations, with action plans to address non-conformances 	Medium
4. Fire, Explosion and Ignition Source Management	<ul style="list-style-type: none"> Accumulation of flammable vapours and aerosols within spray booths and adjacent areas 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> Ignition sources (electrical equipment, static discharge, hot work, vehicles) not identified or controlled in hazardous zones Inadequate design, selection and inspection of electrical equipment for classified hazardous areas associated with spray painting Lack of an integrated hot work permitting system for maintenance or repairs near spray areas and flammable liquid stores Insufficient housekeeping leading to build-up of combustible residues, rags and packaging in and around spray areas Inappropriate location, type or maintenance of fire detection and suppression systems (extinguishers, hose reels, sprinklers) in spray painting facilities Workers and supervisors unaware of emergency shutdown and isolation procedures for spray booths and chemical storage 		<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>	
5. Health Risk Management, Monitoring and Health Surveillance	<ul style="list-style-type: none"> Chronic exposure to isocyanates, solvents and particulates due to ineffective systemic controls or reliance on PPE alone Lack of baseline and ongoing health surveillance for workers exposed to isocyanates and other respiratory sensitisers Inadequate atmospheric monitoring program to verify effectiveness of ventilation and containment systems No formal process for assessing and managing individual fitness for work in relation to respiratory, dermatological or neurological conditions affected by spray painting Under-reporting and poor follow-up of health complaints such as respiratory 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	irritation, headaches, dermatitis or asthma symptoms • Failure to consider vulnerable groups (young workers, new workers, pregnant workers, those with pre-existing conditions) in systemic controls for spray painting		[REDACTED]	
6. Plant, Equipment and Maintenance Management	• Spray guns, pumps, compressors, pressure pots and mixing equipment not maintained in accordance with manufacturer instructions • Inadequate inspection and maintenance of spray booth structures, doors, interlocks, lighting, filters and ducting • Uncontrolled modifications or repairs to plant that undermine intrinsic safety features or certification • Lack of documented inspection criteria and fault reporting systems for spray painting equipment • Maintenance work on spray booths and ventilation systems performed without proper isolation and decontamination procedures • Using incompatible or poor-quality replacement parts (e.g. non-rated hoses, fittings, filters) that increase risk of leaks, failures or ignition	High	[REDACTED]	Medium
7. Competency, Training and Supervision	• Workers undertaking spray painting without sufficient competency in hazard recognition, equipment use and control measures • Supervisors lacking training in WHS legislative duties and specific spray painting risks, leading to poor enforcement of controls	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> • Training limited to informal on-the-job instruction with no structured curriculum, assessment or records • No refresher training program, resulting in gradual erosion of safe habits and poor uptake of new control measures • Inadequate training for contractors or temporary workers in site-specific spray painting hazards and procedures • Language, literacy or cultural barriers preventing full understanding of WHS information and instructions 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
8. Personal Protective Equipment and Respiratory Protection Program	<ul style="list-style-type: none"> • Over-reliance on PPE in place of higher-order controls for spray painting exposures • Incorrect selection, fit, use, cleaning and maintenance of respiratory protective equipment • Inadequate management of facial hair, medical conditions or other factors that compromise RPE effectiveness • Lack of standardisation in PPE types and brands, causing confusion and inconsistent protection levels • No formal program for fit testing and training in RPE use and limitations • Failure to provide and manage appropriate PPE for adjacent and support workers (e.g. in prep, mixing or clean-up areas) 	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>	Medium

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			[REDACTED]	
9. Procurement, Design and Layout of Spray Painting Facilities	<ul style="list-style-type: none"> • Spray painting operations established in unsuitable buildings or spaces not designed for hazardous chemical use and ventilation requirements • Poor layout resulting in cross-contamination between clean and dirty areas, or interference between spray painting and other work activities • Procurement decisions driven solely by cost without WHS input, leading to selection of sub-optimal booths, equipment or chemicals • Inadequate space allocation for safe storage of flammable liquids, waste and PPE change areas • Insufficient consideration of access for maintenance, emergency response and evacuation when designing spray painting areas 	High	[REDACTED]	Medium
10. Contractor, Visitor and Third-Party Interface Management	<ul style="list-style-type: none"> • Contractors performing spray painting, maintenance or cleaning work without alignment to the organisation's WHS controls • Visitors or non-spray staff entering hazardous areas without awareness of exposure and ignition risks • Overlapping duties and unclear responsibilities between multiple PCBUs operating in or near spray painting areas • Inadequate exchange of information between host employer, contractors and labour hire providers about spray painting hazards and controls 	Medium	[REDACTED]	Low

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	<ul style="list-style-type: none"> Contractor selection primarily based on price without adequate WHS capability assessment 		[REDACTED]	
11. Incident Reporting, Investigation and Corrective Actions	<ul style="list-style-type: none"> Under-reporting of near misses, minor incidents, health symptoms and equipment failures in spray painting operations Superficial incident investigations that focus on operator error rather than systemic causes Delayed or ineffective implementation of corrective actions arising from incidents and inspections Lack of trend analysis, resulting in repeated spray painting incidents and chronic exposures Failure to notify the regulator of notifiable incidents in spray painting as required under the WHS Act 2011 	Medium	[REDACTED]	Low
12. Consultation, Communication and Worker Engagement	<ul style="list-style-type: none"> Workers not meaningfully consulted on spray painting risks, control effectiveness and changes to systems of work Inadequate communication of procedures, risk assessments and emergency arrangements to affected workers and HSRs Limited participation by workers in risk assessments, incident reviews and selection of PPE or equipment 	Medium	[REDACTED]	Low

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	<ul style="list-style-type: none"> Information overload or technical language leading to misunderstanding of key spray painting controls 		[REDACTED]	
13. Emergency Preparedness, Response and Recovery	<ul style="list-style-type: none"> Emergency plans not tailored to spray painting specific scenarios such as chemical spills, fires, loss of ventilation or acute over-exposure Lack of clarity on roles, responsibilities and communication pathways during an emergency originating in spray areas Insufficient drills and exercises involving spray painting personnel and adjacent work groups Inadequate post-incident recovery processes including decontamination, psychological support and staged recommencement of operations 	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/factsheets-and-resources/codes-of-practice>

Safe Work Australia Links

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

South Australia

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

Model Codes of Practice

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

Tasmania

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

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

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