| Termite Management and Pre-Construction Barriers | | | |
|---|---|---|---|
| Business Name: | | ABN: | |
| Business Address: | | | |
| Contact Person: | Phone: | Email: | |

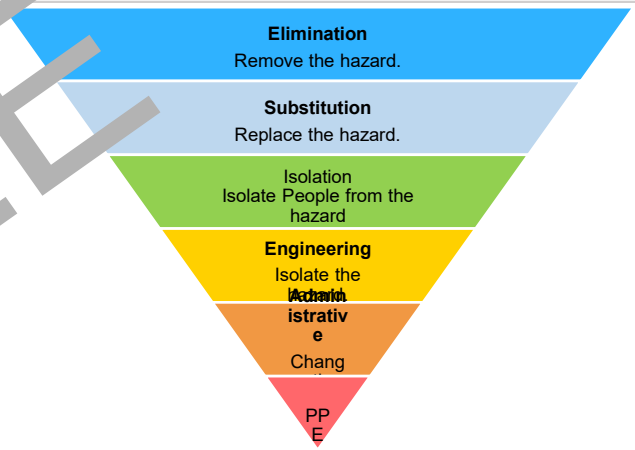
| THIS RISK ASSESSMENT IS APPROVED BY THE PCBU OF THE PROJECT | | |
|---|---|---|
| Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts. | | |
| Full 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 |
|---|---|---|---|---|---|---|---|
| ALMOST CERTAIN | 3 HIGH | 3 HIGH | 4 ACUTE | 4 ACUTE | 4 ACUTE | | |
| LIKELY | 2 MODERATE | 3 HIGH | 3 HIGH | 4 ACUTE | 4 ACUTE | 4A ACUTE | DO NOT PROCEED |
| POSSIBLE | 1 LOW | 2 MODERATE | 3 HIGH | 4 ACUTE | 4 ACUTE | 3H HIGH | Rev before work |
| UNLIKELY | 1 LOW | 1 LOW | 2 MODERATE | 3 HIGH | 4 ACU | 2M MO RATE | Ensure control measures in place. |
| RARE | 1 LOW | 1 LOW | 2 MODERATE | 3 HIGH | 3 H | 1L LOW | Monitor and keep records. |

HIERARCHY OF CONTROLS






### Risk Rating & Required Action:

| | |
|---|---|
| **4A** | Stop work. The risk is intolerable. E inate the hazar redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or hi er-level authorisati is required. |
| **3H** | Review and approve additional c rols b ask arts. Senior supervisor sign-off needed. |
| **2M** | Ensure all nominated controls are in ace and effe ive. 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. WHS Governance, Legal Compliance and Licensing | • Failure to align termite management systems with WHS Act 2011, WHS Regulations and relevant Australian Standards (e.g. AS 3660 series)<br>• Operating without current pest management licences or incorrect licence class for timber pest work<br>• Inadequate verification of competency and currency for technicians and subcontractors<br>• Lack of clear WHS roles, responsibilities and due diligence by PCBUs and officers<br>• Poor integration of termite management procedures with principal contractor's WHS management system on construction projects<br>• Non-compliance with chemical storage, transport and environmental protection legislation<br>• Inadequate documentation and record keeping to demonstrate compliance | 4A | • Establish and maintain a WHS management system that specifically references termite management and pre-construction barriers, aligned with the WHS Act 2011, WHS Regulations and AS 3660 series<br>• Ensure all termite and timber pest work is undertaken only by technicians holding current, appropriate state or territory pest management licences and relevant units of competency<br>• Maintain a central, auditable register of licences, training records, competencies, site inductions and authorisations for employees and subcontractors<br>• Define and document WHS responsibilities for officers, managers, supervisors, technicians and subcontractors, including due diligence obligations and consultation mechanisms<br>• Implement contractor management procedures requiring review of subcontractor WHS systems, SWMS and competency prior to engagement<br>• Integrate company WHS procedures with builder/principal contractor site safety plans, including clear interfaces for work permits, access, and emergency management<br>• Establish a compliance audit program (internal and, where practicable, external) to periodically verify adherence to legal and standards requirements<br>• Develop procedures to ensure chemical storage, decanting, transport and disposal comply with relevant dangerous goods and environmental legislation<br>• Maintain secure, version-controlled WHS documentation, job records, chemical usage logs and inspection reports to demonstrate due diligence | 3H |
| 2. Competency, Training and Supervision of Technicians | • Inadequate formal training in termite biology, building construction, conducive conditions and treatment methods<br>• Insufficient practical supervision of new or inexperienced technicians leading to misclassification of infestations levels or structural risk<br>• Lack of refresher training on new products, changes to Australian Standards or revised manufacturer instructions<br>• Poor understanding of WHS obligations, hazard identification, hierarchy of controls and incident reporting<br>• Subcontractor technicians operating without verification of competency or relying solely on older, outdated practices | 4A | • Develop and implement a competency-based training matrix for all termite-related roles, specifying minimum qualifications, units of competency and industry-recognised courses<br>• Provide structured induction and mentoring programs for new technicians, including supervised inspections and treatments until competency is formally assessed<br>• Schedule regular refresher training (at least annually) on termite management techniques, pre-construction barrier systems, new products and changes in legal or standards requirements<br>• Include WHS-specific training covering risk assessment, hazard identification, incident and near-miss reporting, and use of safe operating procedures<br>• Require subcontractor technicians to provide evidence of qualifications, licences, recent training and field experience before being authorised to work<br>• Implement a field verification process where supervisors periodically accompany technicians on pest inspections and termite treatments to review technique and decision-making<br>• Maintain documented competency assessments, including practical observation checklists, written assessments and sign-off by competent assessors<br>• Provide targeted training on recognising building defects, structural compromise, electrical hazards and access limitations commonly encountered during termite inspections | 2M |

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|---|---|---|---|---|
| SPECIFIC WORK STEPS | HAZARDS THAT MAY ARISE | INITIAL RISK | SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS | RESIDUAL RISK |
| | • Failure to train workers in recognition of structural instability, electrical hazards and confined or restricted workspaces encountered during inspections | | | |
| 3. Systems for Pest Inspections and Infestation Assessments | • Inconsistent or incomplete pest inspections leading to missed termite activity or conducive conditions<br>• Over-reliance on a single detection method (e.g. visual only) without appropriate use of moisture meters, sounding tools or other approved devices<br>• Inadequate inspection templates or checklists resulting in poor documentation and variation in quality between technicians<br>• Failure to adequately document inaccessible areas or site limitations, leading to unreasonable client expectations and potential disputes<br>• Time pressures or poor scheduling resulting in rushed inspections and superficial assessments<br>• Failure to identify structural or environmental conditions that will reduce the effectiveness of proposed management strategies or barriers | 4A | • Develop standardised termite inspection procedures and documented work instructions aligned with AS 3660.2 for post-construction inspections<br>• Implement comprehensive inspection checklists within a digital inspection system, covering all critical building elements, environmental factors and conducive conditions<br>• Specify required inspection tools and equipment (e.g. moisture meter, sounding device, torch, inspection mirror, ladder) and verify availability and calibration/maintenance<br>• Train technicians in systematic inspection patterns (e.g. perimeter, subfloor, interior, roof void) to reduce the risk of missed areas and ensure consistent coverage<br>• Embed mandatory fields in inspection reports to document inaccessible areas, client limitations, previous treatments and known building defects<br>• Establish scheduling controls that allocate realistic timeframes for thorough termite inspections and discourage task compression for commercial reasons<br>• Introduce a quality review process where a sample of inspection reports is periodically audited by a senior technician or supervisor for completeness and accuracy<br>• Require use of photographic evidence to support key findings and to document inaccessible or restricted areas for future reference | 2M |
| 4. Termite Risk Evaluation and Management Planning | • Incorrect classification of termite risk level for a property or construction project<br>• Selection of inappropriate management options or barriers that are not suited to the construction type, soil conditions or climatic region<br>• Failure to integrate termite management plans with overall building design, drainage, landscaping and future alterations<br>• Inadequate communication between assessor, designer, builder and client regarding limitations of termite management systems | 4A | [redacted] | 2M |

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|---|---|---|---|---|
| SPECIFIC WORK STEPS | HAZARDS THAT MAY ARISE | INITIAL RISK | SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS | RESIDUAL RISK |
| | • Overlooking existing structural damage or building defects that must be rectified before or in conjunction with termite control<br>• Lack of documented long-term management strategy including monitoring, retreatment thresholds and maintenance responsibilities | | [redacted] | |
| 5. Pre-Construction Termite Barrier Design and Integration | • Pre-construction termite barrier designs not coordinated with other building services, slab designs or structural elements<br>• Incorrect detailing of barrier terminations, penetrations and interfaces with retaining walls, joints, or step-downs<br>• Dependence on a single barrier type without complementary design features or management controls<br>• Lack of documented design approvals and product specifications prior to installation<br>• Poor communication with other trades leading to damage, bridging or breaching of barrier systems during construction<br>• Inadequate planning for future property modifications that may compromise barriers (e.g. paving, decking, landscaping) | [redacted] | [redacted] | 2M |
| 6. Installation Quality Assurance for Termite Barriers | • Incorrect installation of physical, chemical or hybrid barriers contrary to manufacturer instructions or Australian Standards<br>• Lack of structured inspection and verification during key installation stages (e.g. pre-slab pour, pre-backfill) | 4A | [redacted] | 2M |

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|---|---|---|---|---|
| SPECIFIC WORK STEPS | HAZARDS THAT MAY ARISE | INITIAL RISK | SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS | RESIDUAL RISK |
| | • Inadequate supervision of subcontractors engaged to install barriers<br>• Failure to identify and rectify breaches caused by other trades (e.g. penetrations through barrier, removal of components)<br>• Use of unauthorised or counterfeit barrier products and components<br>• Insufficient documentation and photographic evidence to verify installed barrier continuity and compliance | | [redacted] | |
| 7. Post-Construction Termite Management and Monitoring Systems | • Lack of formal ongoing monitoring regime after initial termite treatment or barrier installation<br>• Failure to schedule and complete regular inspections within recommende intervals as per AS 3660.2 and manufacturer requirem<br>• Inadequate syste for tracking follow-up treatments, bai tation chec monitoring device<br>• Client misunderstanding of their responsibilities for ongoing inspec and environmental mana<br>• Inconsistent criteria for determining when additional treatments or escalated responses are required<br>• Loss of historical treatment and inspection data, leading to poor trend analysis and decision-making | 3H | [redacted] | 2M |
| 8. Hazardous Chemicals Management for Termiticides and Pesticides | • Inappropriate selection or use of termiticides or other pesticides beyond label conditions, permits or APVMA approvals | 4A | [redacted] | 2M |

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|---|---|---|---|---|
| SPECIFIC WORK STEPS | HAZARDS THAT MAY ARISE | INITIAL RISK | SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS | RESIDUAL RISK |
| | • Inadequate storage, segregation and labelling of chemicals at depots, in vehicles or on construction sites<br>• Lack of current Safety Data Sheets (SDS) and product risk assessments readily accessible to workers<br>• Absence of standard procedures for spill response, decanting, mixing and application leading to exposure or environmental contamination<br>• Inadequate training in chemical hazard awareness, PPE selection and decontamination practices<br>• Poor inventory control leading to use of expired products or uncontrolled accumulation of hazardous chemicals | | [redacted] | |
| 9. Exposure Control for Workers, Clients and the Public | • Uncontrolled worker exposure to hazardous chemicals via inhalation, ski contact or ingestion during treatment activities<br>• Inadequate plann g for work in occupied premises hildca are or public facilities<br>• Failure to restrict access to treate zones during and after chemical application, including pre-construction soil treatments<br>• Poor ventilation management when working in enclosed or confined spaces such as subfloors or roof voids<br>• Cross-contamination of vehicles, tools, PPE or clothing leading to secondary exposures<br>• Lack of consideration for sensitive individuals (e.g. asthma, allergies, pregnancy) when scheduling and planning treatments | 4A | [redacted] | 2M |

| 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 |
| 10. Access, Environment and Structural Safety During Inspections | • Uncontrolled entry into structurally compromised areas (damaged floors, rotten timbers, termite-weakened beams)<br>• Working in restricted or confined spaces (subfloors, roof voids, crawl spaces) without adequate risk assessment<br>• Slips, trips and falls in cluttered, poorly lit or uneven environments around and within structures<br>• Unmanaged interaction with live electrical installations, wiring or equipment during inspections<br>• Exposure to biological hazards such as mould, vermin droppings or contaminated water in subfloor and roof spaces<br>• Inadequate systems for assessing a controlling work at height when accessing roofs or elevated structures during inspections | 3H | [redacted] | 2M |
| 11. Client Communication, Documentation and Expectation Management | • Clients misunder anding the limitations of termi treatm barriers, expecting t manent protection<br>• Inadequate communication of inspection findings, inclu sidual risk, inaccessible areas and need for rectification works<br>• Poorly drafted reports or treatment proposals that omit critical technical or safety information<br>• Failure to provide pre- and post-treatment information in a form that clients can understand and retain<br>• Disputes and reputational damage arising from undocumented advice or verbal-only agreements<br>• Clients unknowingly undertaking building modifications or landscaping | 3H | [redacted] | 2M |

| 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 |
| | that compromise barriers or management systems | | [redacted] | |
| 12. Vehicle, Plant and Equipment Management | • Poorly maintained vehicles used for transporting chemicals, equipment and personnel to termite management sites<br>• Inadequate maintenance and inspection regimes for pumps, hoses, injection equipment and monitoring devices<br>• Equipment failure leading to uncontrolled release of chemicals or ineffective termite treatment<br>• Lack of calibration or verification for application equipment resulting in under-dosing or over-dosing<br>• Improvised or unsuitable equipment used in restricted spaces or on construction sites<br>• Insufficient segregati[redacted]mical transport from pass[redacted]ger compartments in vehicles | 3H | [redacted] | 2M |
| 13. Contractor, Subcontractor and Third-Party Coordination | • Inconsistent WHS standards betw[redacted]n principal contractor, termite management provider ar[redacted]r trades on construction sites<br>• Poor coordination of work sequences causing re-work, barrier damage or uncontrolled exposure to chemicals<br>• Subcontractors undertaking termite-related tasks without proper authorisation, licences or adherence to company procedures<br>• Inadequate exchange of information on site-specific hazards, emergency procedures and restricted areas | 3H | [redacted] | 2M |

| 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 |
| | • Lack of clarity regarding responsibility for barrier integrity during subsequent construction stages<br>• Failure to verify that third-party design or engineering changes do not compromise termite management systems | | [redacted] | |
| 14. Incident, Near-Miss and Non-Conformance Management | • Unreported or poorly investigated incidents and near misses involving chemical exposure, structural hazards or barrier failures<br>• Repetition of similar WHS or quality incidents due to lack of root cause analysis and follow-up<br>• Non-conformances in termite inspections, infestation assessments or barrier installations going uncorrected<br>• Inadequate feedback loops from field staff to management regarding emerging risks or product performance issues<br>• Failure to notify regulators or clients where required after serious incidents or significant termite-related structural findings<br>• Data from incidents not used to revise procedures, training or system design | 3H | [redacted] | 2M |
| 15. Health Monitoring, Fatigue and Psychosocial Risk Management | • Long driving distances between inspection and treatment sites contributing to fatigue-related incidents<br>• High workload, tight schedules and client expectations leading to stress and rushed decision-making<br>• Inadequate consideration of health monitoring needs for workers regularly handling hazardous chemicals<br>• Working alone in remote or isolated locations without effective communication and escalation procedures | 3H | [redacted] | 2M |

| 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 |
| | • Exposure to unpleasant environments (subfloors, roof voids, infestation sites) increasing psychological discomfort or stress<br>• Lack of systems to support workers reporting health concerns related to chemical exposure or ergonomic strain | | [redacted] | |
| | | | | |
| | | | | |

## 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 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

**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-of-codes-of-practice

**Northern Territory**
Work Health and Safety (National Uniform Legislation) Act 2011
Work Health and Safety (National Uniform Legislation) Regulations 2011
Legislation NT: https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws
Codes of Practice NT: https://worksafe.nt.gov.au/forms-and-resources/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

**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.

**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

**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

**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

**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