



A U S T R A L I A N   M E A T   P R O C E S S O R   C O R P O R A T I O N

# Developing Resources for Compliance with Recently Harmonized Work Health and Safety Legislation for High Priority Areas in the Red Meat Processing Industry

<b>Project code:</b>	2016-1025
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<b>Date submitted:</b>	18 <sup>th</sup> March 2016
<b>Date published:</b>	13 <sup>th</sup> December 2016
<b>Published by:</b>	Australian Meat Processor Corporation

The Australian Meat Processor Corporation acknowledges the matching funds provided by the Australian Government to support the research and development detailed in this publication.

## Abstract

This project developed resources to address critical gaps in work health and safety (WHS) resources in the red meat processing industry. The training and assessment support materials for the WHS unit of competency at Certificate II in the Meat Industry Training Package targeting workers in the industry, was revised and updated to reflect compliance with the recently introduced WHS legislation and emerging high priority WHS issues in the industry. A 'WHS guide for maintenance personnel in the red meat processing industry' and fact sheet on 'Contractor WHS management in the red meat processing industry' were developed to provide guidance to maintenance personnel to help them address the high risk nature of maintenance work and the broadened WHS responsibilities of maintenance personnel under the recently introduced WHS legislation.



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## 1.0 Executive summary

This project focused on developing and/or revising WHS materials for key groups in the meat processing industry primarily focusing on compliance with the recently introduced nationally harmonized WHS legislation. It should be noted that the WHS legislation has been enacted in most states and territories of Australia with the exception of Victoria and WA.

The training and assessment support materials for the core unit of competency 'Follow safe work policies and procedures' at Certificate II in the Meat Industry Training Package (targeting workers in the red meat processing industry) were revised and updated with a particular focus on compliance with the recently harmonized, nationally consistent WHS laws and emerging high priority WHS issues in the industry.

A 'WHS guide for maintenance personnel in the red meat processing industry' and fact sheet on 'Contractor WHS management in the red meat processing industry' were developed in consultation with industry maintenance engineering personnel. These are the first WHS resources that specifically target maintenance personnel in the industry.

The work of maintenance engineering in the industry is changing rapidly primarily due to technological changes. It is also broadening, becoming more complex and crossing trades and has a high risk of accidents. In spite of this maintenance personnel have been largely left out of training initiatives in the industry and in general have had no systematic formal WHS training since their trade qualifications (beyond short courses such as 'Working at heights' or 'Confined spaces.')

They do not undertake the core units in the Meat Industry Training Package including the WHS units at Certificates II and IV. There are no training and assessment support materials targeted to maintenance engineering to support delivery of the core WHS units in the Meat industry Training Package. The WHS Guide developed in this project has been developed as a training support guide particularly targeting the core WHS unit at Certificate IV, 'Participate in OH&S risk control process' (MTMCOR403A) in the Meat Industry Training Package. The guide may also be used to support the delivery of the core unit '*Follow safe work policies and procedures*' at Certificate II.

The fact sheet, 'Contractor WHS management in the red meat processing industry' was developed primarily to help meat processing plants meet requirements in the recently introduced nationally harmonized WHS legislation which broadens the definition of a 'worker' beyond personnel employed directly by the plant to include any 'person who carries out work in any capacity for a person conducting a business or undertaking' (S7.1 WHS Act). This includes contractors and subcontractors. The majority of contractors in the meat processing industry are in the maintenance engineering field (frequently conducting high risk work) and must be supervised on site by the organisation's maintenance engineering personnel.

The new WHS legislation also introduces 'officers.' Under the legislation, an officer is a senior executive who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business or undertaking. This definition would include the head of the maintenance engineering department and make them directly responsible for contractors working on maintenance tasks.

The guide and fact sheet were developed in consultation with industry and the draft documents distributed for feedback to the AMIC National WHS Committee and to a sample of participants in the AMPC/MINTRAC engineering network. The documents were revised in response to feedback. Main areas of feedback included the breadth of coverage of topics, the means of distribution and the need for WHS training for maintenance personnel in the industry. The guide focuses on the risk management approach to the management of hazards in the industry. It then applies that approach to the management of a sample of high risk areas.

Maintenance work in the industry is extremely broad covering almost every trade area from entry level to post-trade, and beyond to engineering. It is not possible to cover every hazard in maintenance work in the industry, however the guide doubled in size to accommodate the topics requested by personnel in the industry.

The guide and fact sheet need to be as broadly available to the industry as possible. This can be done through presentations to the industry at industry events such as the MINTRAC training conference and the AMPC/MINTRAC engineering network meetings and making the resources available free of charge via the AMPC and MINTRAC websites. The guide and fact sheet may also be included on the MINTRAC WHS for supervisors website with hyperlinks to individual topics.

A short video presentation introducing the resources has been developed targeting maintenance engineering personnel. The video may be loaded onto the AMPC and MINTRAC websites and shown at industry events and engineering network meetings. Feedback from industry personnel also proposed the production of a video on WHS for maintenance engineering. The best option may be to develop an e-learning program to support the delivery of the Certificate IV WHS unit, 'Participate in OH&S risk control process' targeted to maintenance personnel. This program could be delivered by registered training organisations (RTOs) to groups and/or undertaken by individual maintenance personnel on laptop or PC in their own time, thus catering for the needs of maintenance personnel who frequently are unable to leave their worksite.

## 2.0 Project objectives

The objectives of this project are to:

- Revise and update the MINTRAC support materials for the WHS unit at Certificate II targeting workers
- Develop a WHS guide for maintenance personnel in the industry covering the responsibilities of senior managers, supervisors and workers in maintenance departments to comply with the new WHS legislation as it applies to maintenance departments in the industry.
- Develop a fact sheet for senior managers on contractor WHS management in the red meat processing industry which focuses in particular on compliance with WHS legal requirements.

## 2.1 Products of the project

Consistent with the objectives of the project, the outputs of the project are:

- Revised and updated training and assessment support materials for the WHS unit MTMCOR204A 'Follow safe work policies and procedures' at Certificate II (targeting workers in the meat industry), in the MINTRAC managed Meat Industry Training Package. The materials will address the WHS responsibilities of workers under the new WHS legislation as they apply to what workers need to do to comply in meat processing plants, using high risk WHS issues in the plants as examples reflecting workers' roles in the areas.
- A 'WHS guide for maintenance personnel in the red meat processing industry' covering the responsibilities of senior managers, managers, supervisors and workers in maintenance departments to comply with the new WHS legislation as they apply to maintenance departments and maintenance work in the industry. The guide focuses in particular on how senior maintenance managers meet their requirements under the WHS legislation as 'officers,' and the broadening of their responsibilities to include the management of contractors on site.
- A fact sheet (Snapshot) on 'Contractor WHS management in the red meat processing industry' which focuses in particular on compliance with WHS legal requirements
- A promotional video completed in consultation with AMPC.

### 3.0 Methodology

The methodology to conduct the project included:

1. Consultation with MINTRAC on the re-development of the training and assessment support materials for the WHS unit MTMCOR204A 'Follow safe work policies and procedures' at Certificate II to ensure the materials are consistent with all the support materials in the Meat Industry Training Package and completed in the MINTRAC template for training and assessment support materials.
2. Consultation with MINTRAC and industry representatives on the high priority WHS hazards that should be included in the resources and emerging trends of health and safety experience in the meat processing industry, eg prevention of bullying and harassment.
3. Re-development of the training and assessment support materials for the WHS unit 'Follow safe work policies and procedures' to cover the elements and performance criteria in the unit of competency, MINTRAC requirements, compliance with the new WHS legislation, the high risk hazards identified and the emerging trends of health and safety experience in the meat processing industry.
4. Feedback from MINTRAC on the re-development of the training support materials and finalization of the materials.
5. Development of draft 'WHS guide for maintenance personnel in the red meat processing industry.'
6. Development of draft industry fact sheet on 'Contractor WHS management in the red meat processing industry.'
7. Presentation of the draft guide and contractor WHS management fact sheet to the industry AMIC national WHS committee and the AMPC/MINTRAC engineering network to obtain input and feedback.
8. Modification of the guide and fact sheet in response to the feedback.
9. Finalisation of the guide and fact sheet.
10. Development of the promotional video introducing and explaining the resources.

## 4.0 Results and discussion

### Training and assessment materials for the WHS unit at Certificate II

Two meetings were held with MINTRAC to discuss the re-development of the training and assessment materials for the 'Follow safe work policies and procedures' unit. The outcomes of these meetings included:

- Incorporating minor changes to the unit as a result of the review of the Meat Industry Training Package
- Provided with the template to be used for the development of training and assessment support materials
- Provided with feedback received by MINTRAC on the existing training and assessment support materials for consideration with development of new materials
- Photos identified that could be included in the new resources however not all were included because the inclusion of the photographs made the file too large to be saved as a single file.

MINTRAC advised that they felt the materials should primarily target small to medium meat processing companies. They felt the main WHS priorities for the industry included:

- Slips, trips and falls
- Manual handling
- Knife injuries
- Zoonotic diseases.

MINTRAC did not feel that psychological injuries or bullying and harassment should be included.

The translation of the current materials into six different languages was discussed. As an outcome of the meeting Margaret approached the NSW WorkCover Authority to see whether any funding might be available from the Authority to help industry transition to the new harmonized WHS legislation but they indicated they would not fund anything of this nature.

The materials were developed in the MINTRAC template bearing in mind the feedback from MINTRAC. The resulting materials are a large document of 107 pages and 2.4 MB. The changes to the document have been tracked and the tracked changes and final draft document provided to MINTRAC for feedback. MINTRAC reviewed and approved the materials. The materials will be incorporated in the resources for delivery of the Meat Industry Training Package and made available to the industry and RTOs through MINTRAC.

### Development of contractor WHS management fact sheet

The fact sheet, 'Contractor WHS management in the red meat processing industry' was developed primarily to help meat processing plants to meet requirements in the recently introduced nationally harmonized WHS legislation which broadens the definition of a 'worker' beyond personnel employed directly by the plant to include any 'person who carries out work in any capacity for a person conducting a business or undertaking' (S7.1 WHS Act). This includes contractors and subcontractors. The majority of contractors in the meat processing industry are in the maintenance engineering field (frequently conducting high risk work) and must be supervised on site by the organisation's maintenance engineering personnel. The new WHS legislation also introduces 'officers.' Under the legislation, an officer is a senior executive who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business or undertaking. This definition would include the head of the maintenance engineering department and make them directly responsible for contractors working on maintenance tasks. It is therefore critical for maintenance departments to have systems in place to manage contractors. The systems are set out in the fact sheet. When the systems are in place they provide evidence that contractors are being managed on site and management has met their WHS legal responsibilities to ensure the work of contractors is conducted safely on site.

## Development of WHS guide for maintenance personnel

The primary reasons for the need for the WHS guide for maintenance personnel included:

- The current absence of resources for maintenance engineering
- The changes in the recently introduced WHS legislation which have significant impact on the work and responsibilities of maintenance personnel
- The general absence of training for maintenance staff in the new WHS legislation and how it impacts on them and their work
- The WHS legislation placing greater responsibilities on senior maintenance engineering managers (who may be deemed 'officers' under the new legislation), and the broadening of responsibility to extend beyond employees to anyone undertaking activities for the business
- The high risk nature of maintenance engineering work
- Maintenance lagging behind production areas in terms of management systems including work instructions and standard operating procedures
- The rapidly changing nature of maintenance engineering work in meat processing plants due primarily to technological changes such as automation and changes in ICT.

The draft WHS guide has been developed to address each of these areas. The guide:

- Provides a WHS resource customized to meet the needs of personnel working in maintenance departments in meat processing plants
- Outlines the changes in WHS legislation and the role of maintenance and engineering personnel in complying with the legislation
- Outlines general management systems and the risk management approach to WHS and applies them to the management of high risk areas of maintenance engineering work
- Helps maintenance engineering personnel to set up and implement systems that can respond to and accommodate continuing change such as changes associated with the introduction of new technologies.

## Feedback on WHS guide and contractor WHS management fact sheet

The guide and fact sheet were developed in consultation with industry, and the draft documents distributed for feedback to the AMIC National WHS Committee and to a sample of participants in the AMPC/MINTRAC engineering network. The documents were revised in response to feedback.

Feedback fell into a number of areas including:

- Whether to refer to 'maintenance,' 'engineering,' or 'maintenance engineering' throughout the documents
- The level the guide should be targeted to
- The depth and breadth of coverage of topics
- The methods of distributing the guide and fact sheet
- Broader feedback on maintenance management systems and training.

The general feeling in regard to whether to refer to maintenance, engineering or maintenance engineering was that the most appropriate term for the materials produced in this project is 'maintenance' as maintenance departments in the industry are still predominantly resourced by tradespersons. It was felt that only some of the larger plants had engineers and where there were engineers they were most likely to be senior managers who may be working in production and/or maintenance areas in the plant. It was felt calling the AMPC/MINTRAC network 'engineering' was appropriate as it targeted senior managers in the maintenance and/or production areas.



Maintenance engineering covered all contingencies but was not a term generally used in the industry. It was felt maintenance remained the term used by the majority of the industry, and personnel working in the area are most likely to identify with this term and regard the documents as relevant to them.

There was some debate about the level the guide should be directed to. It was explained that the guide had been developed on the basis of targeting the supervisor level or Certificate IV to be used as a resource for delivery of the WHS unit at Certificate IV. It was felt that the guide could also be used to deliver the WHS unit at Certificate II under the guidance of an RTO.

There was significant feedback on topics that should be included in the guide to the extent that the guide doubled in size to accommodate the topics requested by personnel in the industry. Maintenance work in the industry covers almost every trade area from entry level to post-trade and beyond to engineering. In line with WHS legislation, the guide focuses on the risk management approach to the management of hazards in the industry. It then applies that approach to the management of a sample of high risk areas.

### Distribution of the WHS guide and contractor WHS management fact sheet

Feedback from industry maintenance and WHS personnel focused primarily on the need to distribute the guide and fact sheet to maintenance personnel as broadly as possible because there are currently no WHS resources available targeted to maintenance work in meat processing plants. A number of maintenance personnel who provided feedback felt that maintenance personnel had been left out of training in the industry and they hadn't even been trained in the core competencies in the meat industry (including WHS, hygiene and sanitation and QA) that were provided to virtually all production staff. They commented that they'd had no general training in WHS as it applied to their role in maintenance in the meat processing industry (other than short courses on specific areas such as confined spaces or working at heights).

They felt that the resources that are the products of this project needed to be readily available and accessible and topics easily located by personnel searching for information. This may for example be achieved by including the guide and fact sheet (with topics hyperlinked to relevant sections of the guide) on the MINTRAC WHS for supervisors website.

In the first instance industry maintenance personnel need to know that the resources are available. This may be achieved through presentations to the industry at industry events such as the MINTRAC training conference and the AMPC/MINTRAC engineering network meetings and making the resources available free of charge via the AMPC and MINTRAC websites.

A short video presentation introducing the resources has been developed targeting maintenance engineering personnel. The video may be loaded onto the AMPC and MINTRAC websites and shown at industry events and engineering network meetings.

### WHS training for maintenance personnel

Feedback from industry personnel raised the broader issues of training including:

- Few opportunities for maintenance personnel to participate in training in the industry due to staff shortages and/or under-resourcing
- Problems of maintenance personnel being freed from production to attend training
- Difficulty freeing maintenance personnel for training in groups during production as only one or two staff could be spared at any one time
- Difficulty accessing suitable training
- Training for maintenance staff not given a high priority in some plants
- The need for plants to take a more systematic and planned approach to training.

Maintenance personnel feedback was that maintenance staff should all participate in training in the WHS units of competency in the Meat Industry Training Package to link WHS with the needs of maintenance personnel in the meat processing industry. Feedback also proposed the production of a video on WHS for maintenance personnel.

Considering the difficulty freeing maintenance personnel to participate in training, particularly freeing a number of staff at any one time, the best option may be to develop an e-learning program to support the delivery of the Certificate IV WHS unit, 'Participate in OH&S risk control process' targeted to maintenance personnel. This program could be delivered by registered training organisations to groups and/or undertaken by individual maintenance personnel on laptop or PC in their own time, thus catering for the needs of maintenance personnel who frequently are unable to leave their work in any numbers and may also be unable to leave the worksite.

### Broader maintenance issues

Feedback from industry personnel raised broader issues in maintenance engineering in the meat processing industry. These issues included:

- Staff shortages and under-resourcing in maintenance areas in some plants
- No systematic, planned approach to training of maintenance personnel in some plants
- Generally no standard operating procedures and work instructions for maintenance work in some meat processing plants
- Generally no systematic approach to risk assessments for many maintenance tasks, plant etc in a number of plants.

The feedback on poor development of management systems in maintenance areas is a significant concern considering the high risk nature of much of the work in the area and the risk exposure this poses for the industry if it is widespread.

### Success in achieving objectives

The project objectives have been met. The products of the project have been developed with significant involvement of industry personnel in their development. A video has been produced promoting the products of the project. The video is currently being presented at meetings of the engineering network. The project is also being presented as part of a presentation at the MINTRAC training conference in April 2016. There is considerable industry interest in receiving the WHS guide and contractor management factsheet.

## 5.0 Conclusion

In spite of the new WHS legislation coming into effect in most states and territories around 2012 (with the exception of Victoria and WA), there are still large numbers of industry personnel who do not know about the changes in the legislation particularly those changes related to their specific WHS responsibilities. The products of this project help address those gaps.

Industry feedback welcomed the WHS guide and fact sheet for maintenance personnel that provide one of the first WHS resources specifically targeting maintenance personnel in the meat processing industry. The general feeling from maintenance personnel was that they'd largely been left out of training, and training in WHS in particular. Feedback highlighted the high risk nature of maintenance work but the maintenance area in some plants does not have standard operating procedures and work instructions or general WHS training for maintenance work in the meat processing industry.

## 6.0 Recommendations

The recommendations arising from this project include:

1. Distribution of the products of the project to industry via:
  - Loading the promotional video onto the AMPC and MINTRAC websites, showing the video at engineering network meetings and other industry events
  - Making the training and assessment support materials for the core unit of competency 'Follow safe work policies and procedures' at Certificate II in the Meat Industry Training Package available to industry and RTOs through the MINTRAC website
  - Making the 'WHS guide for maintenance personnel in the red meat processing industry' and fact sheet on 'Contractor WHS management in the red meat processing industry' available to industry through the MINTRAC and AMPC websites.
2. Using the WHS guide as a resource for training maintenance personnel in the two core WHS units of competency in the Meat Industry Training Package, ie 'Follow safe work policies and procedures' at Certificate II and 'Participate in OH&S risk control process' at Certificate IV and promoting the delivery of these units to maintenance personnel in maintenance areas in the industry.
3. Producing a video or e-learning program on WHS for maintenance personnel in the meat processing industry that meets the requirements for the unit 'Participate in OH&S risk control process.' This will provide flexibility to delivery of the unit by helping to address the problems maintenance personnel have being freed from their site to participate in training during production or being freed in large numbers for onsite training during production.
4. Promoting the systematic approach to training and the resources of AMPC project no: 2014:1028 to disseminate options for training maintenance engineering personnel to meat processing plants. The resources include:
  - A 'Guide to maintenance engineering competencies and training options'
  - A 'Workforce planning guide for maintenance engineering '
  - A 'Recruitment and retention guide for maintenance engineering in the meat industry.'
5. Encouraging a more systematic approach to the development and implementation of maintenance engineering management systems in meat processing plants.

## 7.0 Appendices

The 'WHS guide for maintenance personnel in the red meat processing industry,' 'Contractor WHS management in meat processing plants' factsheet and the training and assessment support materials for the core unit of competency 'Follow safe work policies and procedures' at Certificate II in the Meat Industry Training Package are provided as separate files to this report.