



Annual Report

Commission for
Occupational Safety and
Health

2011-2012

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STATEMENT OF COMPLIANCE

HON SIMON O'BRIEN MLC
MINISTER FOR COMMERCE

Dear Minister

In accordance with section 16 of the *Occupational Safety and Health Act 1984*, I submit for your information and presentation to Parliament, the Annual Report of the Commission for Occupational Safety and Health for the 12 months ending 30 June 2012.



George Allingame
Chair
Commission for Occupational Safety and Health

REPORT FROM THE CHAIR

As Chair of the Commission for Occupational Safety and Health (the Commission), I am pleased to present its annual report for the year ended 30 June 2012.

The Commission is established under the *Occupational Safety and Health Act 1984* (the OSH Act) and is responsible to the Minister for Commerce. The Commission's functions include providing advice to the Minister on occupational safety and health (OSH) matters and publishing occupational safety and health codes of practice and guidance material.

The Commission continues to be guided by the visions and objectives outlined in its Strategic Plan for 2011-2012. The ongoing commitment of the Western Australian government to the principles of harmonisation, under the auspices of the *Inter-Governmental Agreement for Regulatory and Operational Reform in Occupational Health and Safety* (the WHS IGA), has ensured that this continues to be a significant component of the Commission's work. Contributing to the development of model regulations and model codes of practice has been the principal focus of the Commission and its sub-committees. The Commission also continued to monitor issues arising under Western Australian health and safety laws and to provide timely and relevant advice to the Minister for Commerce.

The Commission's advisory committees play a key role in achieving the Commission's objectives and in 2011-2012 were involved in several significant initiatives. In particular, the Working Hours Review Working Party provided substantive feedback to Safe Work Australia on the draft model *Code of Practice: Preventing and Managing Fatigue in the Workplace*.

While the work of harmonisation has proven challenging, the Commission has continued to work to meet its objectives as the peak forum on OSH issues in Western Australia. Once again, the Commission partnered with WorkSafe and WorkCover in hosting the Work Safe Forum in Perth in October 2011. The forum continued to be popular, with 490 delegates registered for the event. Regional forums were also held in Kalgoorlie and Geraldton. These forums provide an excellent opportunity for safety and health representatives to learn about new developments in OSH and to learn from the experiences of others performing this important role.

Looking towards the coming year, the Commission will continue to participate in the ongoing national harmonisation process and review its strategic objectives to ensure they continue to meet the expectations of Western Australians as the peak body of occupational safety and health matters this State.

In closing, I would like to thank members of the Commission and members of all advisory committees and working parties for their efforts and dedication during the year. In particular, I would like to recognise the contributions of Ms Anne Bellamy of the Chamber of Commerce and Industry WA (Inc) (CCIWA), who stepped down from the Commission in December of 2011 after almost 19 years as a member. Anne commenced her membership of the Commission in February of 1993, and her commitment and knowledge have made a significant contribution to the safety and health of Western Australian workplaces.

Finally, on behalf of the Commission, I would like to acknowledge and thank all WorkSafe staff for their hard work and professionalism over the past year.



George Allingame

Chair, Commission for Occupational Safety and Health

SECTION ONE: ABOUT THE COMMISSION

Responsible Minister

The Minister for Commerce, the Hon Simon O'Brien MLC, is responsible for the administration of the OSH Act. Section 16 of the OSH Act requires the Commission to submit to the Minister a report of its operations and the operation of the OSH Act and any prescribed law during the year ending 30 June.

Enabling Legislation

The Commission was established in April 1985 (as the Occupational Health, Safety and Welfare Commission) under section 6 of the OSH Act.

Our Vision – 2012

The Commission's vision is to be the peak consultative forum on occupational safety and health issues.

As a tripartite group, the Commission will show strong leadership and engagement with the community. The Commission will contribute to an environment where the occupational safety and health legal framework supports safety and health in Western Australian workplaces now and in the future.

Functions of the Commission

The Commission is funded through the WorkSafe division of the Department of Commerce.

The Commission's functions include:

- inquiring into and reporting to the Minister upon any matters referred to it by the Minister;
- advising and cooperating with Government departments, public authorities, unions, employer organisations and other interested parties;
- developing and reviewing OSH legislation and associated standards and making recommendations to the Minister;
- publishing OSH information, codes, standards, specifications and guidance material; and
- reviewing registration and licensing schemes.

Composition of the Commission

In accordance with section 6 of the OSH Act, the Commission is comprised of:

▪ an independent Chair (nominated by the Minister);
▪ the WorkSafe Western Australia Commissioner;
▪ two officers of the Public Service nominated by the Minister, one of whom must be an officer from the department responsible for the administration of the <i>Mines Safety and Inspection Act 1994</i> ;
▪ two members nominated by the CCIWA;
▪ one member nominated by the Chamber of Minerals and Energy of Western Australia (CME);
▪ three members nominated by UnionsWA, one of whom must have knowledge and experience of the mining industry in Western Australia; and
▪ three members having knowledge of or experience in OSH (nominated by the Minister).

The following members held office during 2011/2012:

- Independent Chair: George Allingame
- WorkSafe Western Australia Commissioner: Lex McCulloch
- Officers of the Public Service: Brian Bradley (Deputy Chair), Director-General, Department of Commerce; Malcolm Russell, Executive Director, Resources Safety Division, Department of Mines and Petroleum
- Members nominated by the CCIWA: Andrea Roelofs; Anne Bellamy (to December 2011) and Karin Lee (from February 2012)
- Member nominated by the CME: Nicole Roocke
- Members nominated by UnionsWA: Gary Wood; Joy Barrett; Linda Morich
- Three members with knowledge of or experience in OSH, nominated by the Minister: Dr Barry Chesson; Dr Matthew Davies; and Dr Peter Connaughton.

SECTION TWO: GOVERNANCE DISCLOSURES

Commission's Governance Framework

The Commission's Handbook and Code of Conduct 2005 sets out its governance principles, which include:

- values;
- accountability;
- role and operation;
- administration;
- record keeping; and
- coordination between WorkSafe and the Commission.

Compliance with Public Sector Standards and Ethical Codes

Under section 9 of the *Public Sector Management Act*, the Commission is obliged to comply with the Western Australian Public Sector Code of Ethics.

Recordkeeping

The Commission's record keeping and use of information policy is contained within its Handbook and Code of Conduct 2005. The handbook includes information on documentation of decisions, use of confidential information, security of information and compliance with freedom of information legislation.

Public Interest Disclosure

The Commission maintains a Public Interest Disclosure Register. No matters were raised in 2011/2012 under the *Public Interest Disclosure Act 2003*.

Advertising and sponsorship

In accordance with section 175ZE of the *Electoral Act 1907*, the Commission is required to report annually on any expenditure for advertising, market research, polling, direct mail or media advertising that was incurred by or on behalf of the Commission. Any such information is included in the annual report of the Department of Commerce for 2011/2012.

SECTION THREE: REPORT ON 2011-2012

National harmonisation of occupational health and safety legislation

In July 2008, the Council of Australian Governments formally committed to the harmonisation of work health and safety laws by signing the WHS IGA.

An independent panel reviewed work health and safety laws in each state, territory and the Commonwealth and advised the Workplace Relations Ministers' Council (WRMC) on the optimum structure and content of a work health and safety Act that can be adopted in all jurisdictions.

The model Work Health and Safety Act (the model WHS Act) was endorsed by the WRMC on 11 December 2009. After being released for a public comment period ending in April 2011, the model Work Health and Safety Regulations (the model WHS regulations) were redrafted by Safe Work Australia and presented for approval to the Select Council on Workplace Relations (SCWR, formerly the WRMC) on 10 August 2011. The Commission held a special meeting on 22 July 2011 to consider progress on the development of the model WHS regulations and provided advice to the Minister for Commerce prior to their approval by the SCWR.

Safe Work Australia (SWA) continued to release model Work Health and Safety codes of practice (model WHS codes) during 2011-12 and the Commission, and the Legislation Advisory Committee (LAC), have continued to review the model WHS codes for their application to safety and health in Western Australia. A particular focus of these discussions has been to ensure that important areas of regulation in Western Australia are adequately covered in the model WHS codes when no similar regulation exists in the model WHS regulations.

Safety and health representatives' forum

The Commission presented the 2012 *WorkSafe Forum* in association with WorkSafe and WorkCover Western Australia. Safety and health representatives, safety professionals and officers from all industries and interested members of the community were encouraged to attend the forum.

This forum was held at the Burswood Entertainment Complex on 17 October 2011 and was attended by 490 delegates. The key objective of the forum was to exchange information and ideas on OSH issues.

The forum featured a range of speakers with a wealth of knowledge and expertise in OSH. The 2011 program included a mixture of interesting plenary sessions and concurrent workshop sessions. Popular sessions included *Developing/delivering safety culture* and *Just a personality clash*. Feedback from participants was resoundingly positive.

Commission accredited introductory training courses for safety and health representatives

Under section 14(1)(h) of the OSH Act, the Commission may accredit training courses in OSH. Details of the accreditation process for introductory courses for safety and health representatives is provided in the publication *Guidelines and criteria for accreditation of introductory training courses for safety and health representatives* (the accreditation guidelines), which is available from WorkSafe's website, www.worksafe.wa.gov.au .

The Commission conducted a review of the accreditation guidelines, with a focus on the information required to make an informed approval, and concluded that the accreditation guidelines continued to be an effective document.

The organisations providing Commission-accredited training courses for safety and health representatives are listed on WorkSafe's website. An annual report of participation in training courses for safety and health representatives will be published later in the year on the website.

Publications

The primary focus of the Commission during 2011-12, in relation to publications, has been the review of the model WHS codes. Between December 2010 and June 2012, SWA released 38 model WHS codes for public comment. At various stages the Commission and its subcommittees, the LAC and the Construction Industry Safety Advisory Committee (CISAC), have met to discuss the model WHS codes in a Western Australian context.

Twenty-one of the model WHS codes have now been adopted in jurisdictions where the model laws have been implemented. The Commission has continued to monitor development of the model WHS codes, discuss matters of common concern to member stakeholders, and where applicable provided advice to the Minister for Commerce and feedback to SWA.

In some cases the model WHS codes cover areas presently regulated in Western Australia under the Occupational Safety and Health Regulations 1996 (the OSH regulations) which have no specific regulations under the model WHS regulations. As new drafts of model WHS codes are released, the Commission and the LAC have considered analyses of these gaps.

Guidance Material

Two guides were published in 2011-12 to assist duty holders to meet their obligations in relation to casual workers:

- *Casual workers – managing the safety of a temporary workforce*; and
- *Guide for casual workers*.

These publications were developed by the Risk Advisory Committee (RAC) during 2010-11 and published in 2011-12.

Publication of Commission minutes

At its meeting of 7 December 2012, the Commission decided to make its minutes available to the public through the WorkSafe Library and on the WorkSafe internet site. The minutes are available soon after they are confirmed and drafted to ensure compliance with privacy laws.

Changes to legislation

The following amendments were made to the OSH regulations during 2011/2012.

WRITTEN LAW	GAZETTAL DATE
Occupational Safety and Health Amendment Regulations 2011 Amendment to the definition of asbestos in regulation 5.1	9 September 2011
Occupational Safety and Health Amendment Regulations No.3 2012 Amendments related to fees	15 June 2012

The National Arena

The Commission has continued to participate in the national harmonisation process and the development of the model WHS Regulations and the model codes.

In addition to aligning with the *National Occupational Health and Safety (OHS) Strategy 2002-2012*, the Commission has also closely monitored various other national initiatives that have the potential to impact on OSH in Western Australia. These initiatives have included the National Heavy Vehicle Driver Fatigue Reform Package developed by the National Transport Commission and the Nanotechnology OHS Research and Development Program being undertaken by Safe Work Australia.

Commission for Occupational Safety and Health Strategic Plan 2009-2012

Vision

To be the peak consultative forum on occupational safety and health issues

Mission

Through strong leadership and engagement with the community, the Commission will contribute to an environment where the OSH legal framework supports safety and health in WA workplaces now and in the future

Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
<p>Through strong leadership, maintain the focus, visibility and relevance of the Commission <i>The Commission will ensure its outputs demonstrate strategic focus, visibility and relevance.</i></p>	<p>Align with the National Strategy <i>The Commission will recognise the goals and objectives of the national OSH strategy and positively contribute to identifying priorities and establishing targets agreed at the national level.</i></p>	<p>Engage with the community <i>The Commission will ensure that employers, employees and the broader WA community have access to knowledge and information so that they can exercise their rights and meet their obligations with respect to OSH.</i></p>	<p>Ensure a relevant legislative framework <i>The Commission will ensure the legislative framework remains relevant to the changing world of work.</i></p>	<p>Plan for the future <i>The Commission will identify and respond to emerging issues that impact on OSH.</i></p>
Indicators of success				
<p><i>Increased OSH knowledge and skills in workplaces and the community.</i></p>	<p><i>Actions against elements of the National Strategy are in place.</i></p>	<p><i>Stakeholders are provided with information.</i></p>	<p><i>Commission advises the Minister on the legislative framework and other OSH matters.</i></p>	<p><i>Commission influences the agenda.</i></p>
Strategies				
<p>Influence state and federal governments and their agencies on occupational safety and health issues.</p> <p>Engage with the public and private sectors to promote and deliver effective OSH programs.</p> <p>Maintain and promote effective tripartite relationships and decision making on safety and health in the workplace.</p> <p>Promote a greater understanding of the role of the Commission and its initiatives.</p>	<p>Focus on high incidence /high severity risks.</p> <p>Eliminate hazards and control risks at source where practicable.</p> <p>Improve/enhance the capacity of business operators and workers to manage OSH effectively.</p> <p>Seek to review and prevent occupational disease more effectively in WA.</p> <p>Influence government to improve/enhance OSH outcomes.</p>	<p>Make OSH relevant to a broader range of people and promote a preventative culture.</p> <p>Influence and promote OSH skills development and training.</p> <p>Promote, educate and develop broader community awareness of OSH.</p> <p>Use and expand our networks to engage effectively with the community with a particular focus on regional areas.</p> <p>Address issues that inhibit a preventative approach to OSH within a diverse workforce.</p>	<p>Provide input to relevant parties (including the Minister) on the COAG harmonisation agenda.</p> <p>Monitor and measure the effectiveness of the regulations.</p> <p>Monitor and evaluate issues in WA and consider the need for legislative controls.</p> <p>Reassess the form, nature, purpose and impact of Commission information and guidance materials</p>	<p>Increase the relevance of and priority given to OSH in a world of competing priorities and changing work arrangements.</p> <p>Engage with stakeholders in initiating and developing research.</p> <p>Collect, analyse and utilise information/data to predict and respond to future trends.</p> <p>Monitor and evaluate initiatives leading to continuous improvements.</p>

Engage and consult broadly on safety and health in the workplace
 Provide information and guidance on safety and health that is relevant, credible and accessible

Report against strategic plan 2011-2012

Objective 1: Through strong leadership, maintain the focus, visibility and relevance of the Commission.

The Commission ensures its outputs demonstrate strategic focus, visibility and relevance.

Key achievements 2011-2012:

- participated in the national harmonisation agenda and provided comprehensive advice to the Minister;
- maintained and promoted effective tripartite relationships and decision-making through the various advisory committees; and
- continued to promote the strategic direction of the Commission to enhance and improve OSH in Western Australia by developing and updating standards and codes of practice.

Plans for 2012-2013:

- continue to influence government and relevant bodies on OSH issues by contributing to the development of national harmonised model Work Health and Safety (WHS) legislation, standards and codes of practice;
- continue to maintain and promote effective tripartite relationships and decision making on safety and health in the workplace; and
- continue to promote a greater understanding of the role of the Commission and its initiatives.

Objective 2: Align with the National Strategies

The Commission recognises the goals and objectives of the national OSH strategies and positively contributes to identifying priorities and establishing targets agreed at the national level.

Key achievements 2011-2012:

- continued to monitor developments in the harmonisation process, including consideration of the model WHS codes;
- provided advice to the Minister on issues arising from the model WHS legislation in the Western Australia context; and
- participated in workshops run by Safe Work Australia to develop the *Australian Work Health and Safety Strategy 2012-2022*.

Plans for 2012-2013:

- continue to participate in the national harmonisation agenda and provide advice to the Minister.

Objective 3: Engage with the community

The Commission ensures that employers, employees and the broader Western Australian community have access to knowledge and information so that they can exercise their rights and meet their obligations with respect to occupational health and safety.

Key achievements 2011-2012:

- continue to engage with member organisations in relation to developments nationally.

Plans for 2012-2013:

- to continue to develop, as required, material to ensure the community is provided with information and guidance that is relevant, credible and accessible;
- to participate in the development of national model WHS legislation; and
- to participate in the development of national model codes of practice .

Objective 4: Ensure a relevant legislative framework

The Commission ensures the legislative framework remains relevant to the changing world of work.

Key achievements 2011-2012:

- implemented amendments of the OSH regulations in relation to the definition of asbestos; and
- monitored developments in the national arena with relevance to Western Australian OSH law.

Plans for 2012-2013:

- continue to advise the Minister and contribute to relevant parties on the Council of Australian Governments harmonisation agenda including ongoing development of model WHS codes and implementation issues;
- constantly monitor and evaluate the effectiveness of the regulations;
- monitor and evaluate issues in WA and consider the need for legislative controls; and
- reconsider the form, nature, purpose and impact of Commission information and guidance materials.

Objective 5: Plan for the future

The Commission identifies and responds to emerging issues that impact on occupational safety and health.

Key achievements 2011-2012:

- continued examination of the draft model WHS regulations and model WHS codes with a view to their implementation in Western Australia;
- continued to collect and review information on identified priority OSH issues; and
- assessed potential emerging issues.

Plans for 2012-2013:

- identify, research and monitor emerging trends in OSH.

SECTION FOUR: ADVISORY COMMITTEES

Under section 15 of the OSH Act, the Commission may appoint advisory committees made up of employer and employee representatives and people with specialist knowledge or experience in OSH to assist in the performance of its functions and duties.

Advisory committees and working parties consider matters referred to them by the Commission and make recommendations on aspects of OSH specific to their area of expertise. Each committee and working party is chaired by a member of the Commission.

Legislation Advisory Committee (LAC)

The key objectives of the LAC are to assist the Commission in:

- ensuring a relevant and effective legislative framework by contributing to a review of monitoring and recommending changes to existing regulations;
- influencing state and federal governments on OSH issues by contributing to the development of national standards and codes of practice;
- promoting and delivering effective OSH programs, and in maintaining and promoting effective tripartite relationships and decision making on safety and health in the workplace;
- providing information and guidance on safety and health that is relevant, credible and accessible; and
- engaging and consulting broadly on OSH issues.

Members 2011-2012

- Brian Bradley, Chair, (Department of Commerce)
- Anne Bellamy (Chamber of Commerce and Industry) (to December 2011), and Ms Karin Lee (Chamber of Commerce and Industry) (from February 2012)
- Lex McCulloch (WorkSafe) (from February 2011)
- Linda Morich (UnionsWA)
- David Todd (Chamber of Minerals and Energy)
- Melina Newnan (Resources Safety Division, Department of Mines and Petroleum)
- Gary Wood (UnionsWA)

The Legislation Advisory Committee met on 6 occasions during 2011-2012 and continued its gap analysis of the model WHS regulations.

Construction Industry Safety Advisory Committee (CISAC)

The key objectives of the CISAC are to:

- identify the major health and safety issues in the construction industry and develop an OSH profile of the construction industry;
- identify determinants of good safety and health performance in the construction industry; and
- identify appropriate short and long term goals for the construction industry.

Members 2011-2012

- Mr Lex McCulloch, Chair (WorkSafe)
- Mr Andy Peppercorn (Master Builders Association)
- Ms Anne Bellamy (Chamber of Commerce and Industry)(to December 2011), and Ms Sherrill Lepp (Chamber of Commerce and Industry)(from February 2012)
- Mr Chris Kirwin (WorkSafe)
- Mr Ian Munns (WorkSafe)
- Mr Simon Barry (Housing Industry Association)
- Mr Steve McCann (Construction, Forestry, Mining and Energy Union)
- Mr Glenn McLaren (Australian Manufacturing Workers' Union)
- Mr Greg Wilton (UnionsWA)

The Construction Industry Safety Advisory Committee met on 6 occasions during 2011-12.

Risk Advisory Committee (RAC)

The key objectives of the Risk Advisory Committee (RAC) are to assist the Commission in:

- providing relevant, credible and accessible information and guidance on safety and health, with a specific focus on new and emerging issues;
- improving its capacity to predict future trends in OSH;
- identifying occupational diseases, their causes and how to address them, with specific reference to new and emerging issues; and
- analysing the work environment.

Members 2011-2012

- Ms Andrea Roelofs (Chair) (Chamber of Commerce and Industry)
- Ms Nicole Roocke (Chamber of Minerals and Energy)
- Mr Ian Munns (WorkSafe)
- Dr Matthew Davies (Commission expert member)
- Ms Joy Barrett (UnionsWA)

The RAC met on 7 occasions during 2011-12, reviewing existing and emerging hazards, and revising a comprehensive risk register.

Working Parties

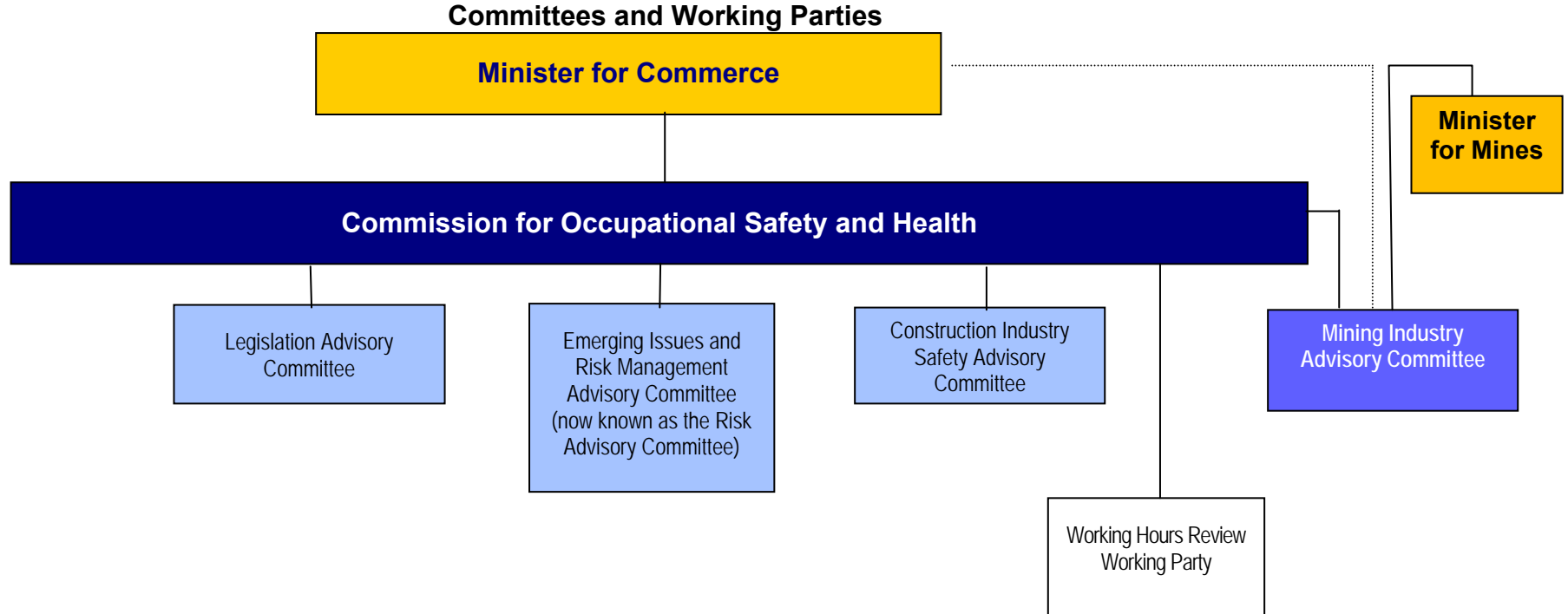
Working hours review Working Party (the WHRWP)

A working party was convened in early 2010 to review the *Code of practice: Working Hours 2006*. Members:

- Mr Lex McCulloch (Chair, WorkSafe)
- Ms Anne Bellamy (Chamber of Commerce and Industry)
- Dr Matthew Davies (Commission expert member)
- Ms Linda Morich (UnionsWA)
- Ms Nicole Roocke (Chamber of Minerals and Energy)

The WHRWP met three times in 2011-12 and completed its review of model *Code of Practice: Preventing and Managing Fatigue in the Workplace* (the model fatigue code), providing valuable feedback to SWA on the Western Australia context. On 4 April 2012 the Commission agreed to suspend the working party until a new draft of the model fatigue code was made available by SWA.

COMMISSION FOR OCCUPATIONAL SAFETY AND HEALTH



- Statutory committee established under the *Occupational Safety and Health Act 1984*. Advises the Minister for Mines and Petroleum on matters concerning the *Mines Safety and Inspection Act 1994*
- Advisory Committees established for the duration of the *Strategic Plan*
- Working Parties are established to provide an expert or technical focus

SECTION FIVE: MINING INDUSTRY ADVISORY COMMITTEE

Changes to the OSH Act effective from April 2005 led to the establishment of a tripartite Mining Industry Advisory Committee (MIAC). The composition and functions of MIAC are set out in section 14A of the OSH Act.

The key objectives of MIAC are to:

- advise and make recommendations to the Ministers and the Commission on OSH matters concerning the mining industry;
- liaise with the Commission to coordinate activities and to maintain parallel standards;
- to make recommendations to the Minister for Mines and Petroleum regarding the formulation, amendment, or repeal of laws relating to occupational safety and health for which that Minister is responsible;
- prepare or recommend the adoption of codes of practice, guidance material, standards and specifications; and
- provide advice on education and training matters in the mining industry.

Membership of MIAC is determined by the Ministers responsible for the administration of the OSH Act and the *Mines Safety and Inspection Act 1994* (MSI Act). The Hon Norman Moore MLC, Minister for Mines and Petroleum is responsible for administration of the MSI Act. MIAC met on three occasions during the financial year 2011-2012.

In May 2012, the three year term of MIAC's members expired and Mr Malcolm Russell stepped down as the Chair on his retirement from the Public Service. Prior to expiry of the terms of membership, the MIAC consisted of:

- Mr Malcolm Russell (Chairperson)
Executive Director, Resources Safety Division,
Department of Mines and Petroleum
- Professor Peter Lilly
Expert member
- Mr Stephen Price
UnionsWA
- Mr Simon Ridge
State Mining Engineer, Resources Safety Division,
Department of Mines and Petroleum
- Mr David Sadler
The Chamber of Minerals and Energy Western Australia
- Mr David Todd
The Chamber of Minerals and Energy Western Australia
- Mr Gary Wood
UnionsWA

During the process of reconstituting the MIAC, the Minister for Commerce and the Minister for Mines and Petroleum agreed to extend the membership to include additional representatives from both industry and UnionsWA along with two extra expert members. It is anticipated that the MIAC will be re-formed in the third quarter of 2012.

Current projects

- Guidance material relating to diesel particulates.
- Principal Mining Health Management Plans.
- Competencies for critical mining occupations.
- Continued consideration of the implications of the model WHS Act, National Mine Safety Framework, Mines Safety Regulations (Core and Non-Core), Codes of Practice and Western Australian Legislation, including a detailed review of mining specific regulations.

Plans for 2011-2012

- Continuing to consider legislative matters arising from harmonised OSH legislation.
- A cooperative roll out of the harmonised OSH legislation package to industry to support its implementation.
- Ongoing development of guidance material.
- Development of a strategic plan.

CONTACT DETAILS

COMMISSION FOR OCCUPATIONAL SAFETY AND HEALTH

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