



engineering
new zealand
Institute of Engineering Professionals

FURTHER SUBMISSION

Health and Safety by Design – Good Practice guidelines

Thank you for the opportunity to provide further feedback on the draft document prior to publication.

We would like to see guidance on Safety in Design that is relevant, accurate, clear and usable for engineers and other design professionals. Engineering New Zealand and the New Zealand Society for Safety Engineering (NZSSE) are not confident that the current draft Guidelines deliver on these objectives.

We acknowledge the reference that the guidelines are not aimed at experts who already have experience in Health and Safety by Design. However, they appear to us to be too long and complicated for the non-expert audience they are targeting, and to fall short of meeting the purpose they set out to achieve of being a good starting point for PCBUs.

We require guidelines that explicitly take engineers and other designers through the practical steps they need to follow, such as how to design safely within complex contractual relationships. The Safe Work Australia Guidelines are comprehensive, easy to understand, and are already widely used by structural engineers in New Zealand.

We would welcome further changes to the draft guidelines to bring them closer to the SafeWork Australia guidelines which we feel are relevant, clear and usable.

Sincerely,

Laura Stockton, Engineering Practice Manager
Neil Miller, Senior Policy Adviser

Hamish Baker, Chair

ENGINEERING NEW ZEALAND

**NEW ZEALAND SOCIETY OF SAFETY
ENGINEERING**