

Questions on Notice - John Holland

1. How often in your tunnelling projects have you suspended, fined or removed a subcontractor due to their failure to adhere to this culture of safety?

Response:

As a first step, workers are warned when they are observed not correctly wearing Respiratory Protective Equipment (RPE). Formal warnings are issued for subsequent observations. Since February 2023 John Holland has documented 19 occasions where a worker was observed not wearing appropriate RPE, which includes not correctly wearing a respirator while working in a tunnel, and formal warnings were issued to the individuals.

On four of these occasions, workers had their project access revoked due to their general attitude in response to initial discussions with the project team after the appropriate disciplinary action was taken.

Supervision, Safety and Project Management always stop to address workers in the field on RPE non-compliance as well as addressing the issue in daily Pre-Start talks on site. These interactions are generally recorded as part of inspection records or Site Diaries. This includes direct engagement with the subcontractor management where the worker is employed by an entity other than John Holland.

This data covers Rozelle Interchange & Western Harbour Tunnel Enabling Works and Sydney Metro Eastern Tunnelling Package.

2. Is it your evidence that your legal department was previously unaware of the ability to redact personal information?

Response:

No, John Holland (as part of joint venture) raised objections on a number of grounds when consulted as part of the Freedom of Information process. Transport for NSW decided to release the data, and we accepted that outcome. Given the same circumstances we would not take that position again and would seek agreement to release redacted data at the earliest opportunity.

3. Could you provide to the Committee a correlation of where you've had exceedances and whether that was a result of a lack of control or a failure of control? Can you identify those and provide them to us?

Response:

It's important to distinguish between an *exceedance* and an *uncontrolled exceedance*. In tunnel environments, exceedances of the Workplace Exposure Standard (WES) set

by Safe Work Australia for respirable crystalline silica (RCS) can occur even when controls are in place due to the nature of the work and the geological conditions. However, actual exposure above the WES is rare due to mandatory use of respiratory protective equipment (RPE).

An uncontrolled exceedance occurs when RCS levels surpass the protection factor of the RPE, which could indicate a failure in higher-order controls such as ventilation, door seals, or HEPA filters.

The WES, set by Safe Work Australia, defines the maximum allowable airborne concentration of RCS. Persons conducting a business or undertaking (PCBUs) must implement controls—engineering (e.g. Local Exhaust Ventilation, wet cutting), administrative, and RPE—to ensure compliance.

The most recent data comes from the Sydney Metro ETP project from April 2024 to April 2025:

- 5 uncontrolled exceedances were due to missing controls or dust from adjacent work areas.
- 2 uncontrolled exceedances resulted from control failures, such as incorrect respirator selection or lack of facial seal (e.g. not clean-shaven).

All exceedances are reported to Comcare.

There were no uncontrolled exceedances recorded on the Rozelle Interchange and WHT Enabling Works projects for this same period.