

How to submit this form

Submission form: Proposed amendments to the Accident Insurance (Occupational Hearing Assessment Procedures) Regulations 1999

The Ministry of Business, Innovation and Employment (MBIE) would like your feedback on proposals on updating the Accident Insurance (Occupational Hearing Assessment Procedures) Regulations 1999. Please provide your feedback by **5pm, on 14 September 2022**.

When completing this submission form, please provide comments, evidence, and any data that may aid your submission. Your feedback provides valuable information and informs decisions about the proposals.

We appreciate your time and effort taken to respond to this consultation.

Instructions

To make a submission you will need to:

1. Fill out your name, email address, phone number and organisation.
2. Fill out your responses to the discussion document questions. You can answer any or all of these questions in the [discussion document](#). Where possible, please provide us with evidence to support your views. Examples can include references to independent research or facts and figures.
3. If your submission has any confidential information:
 - i. Please state this in the email accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 (Official Information Act) that you believe apply. MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act.
 - ii. Indicate this on the front of your submission (e.g. the first page header may state “In Confidence”). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
 - iii. Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 1993 also applies.

How to submit this form

4. Submit your feedback:

i. As a Microsoft Word document by email to ACregs@mbie.govt.nz with subject line:
Consultation: Hearing Assessment Regulations

ii. By mailing your submission to:

The Manager, Accident Compensation Policy
Ministry of Business, Innovation and Employment
PO Box 1473

Wellington 6140
New Zealand

Submitter information

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MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

Your name, email address, phone number and organisation

Name:

Privacy of natural persons

Email address:

Privacy of natural persons

Phone number:

Privacy of natural persons

Organisation:

AudioAccess

- The Privacy Act 2020 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions or a summary of submissions received to MBIE's website at www.mbie.govt.nz. If you do **not** want your submission or a summary of your submission to be placed on our website, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

Please check if your submission contains confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential, and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

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Questions on the proposed objectives

1. Do you agree with the objectives?

Strongly Disagree
Disagree
Neither
Agree
Strongly Agree

If you disagree, which of the objectives listed do you disagree with and why?

[insert response here]

2. Are there other/alternative objectives that should be considered to help shape the discussion?

I would propose Digital. A move to digital will allow greater oversight and auditing, ensuring you meeting all the other objectives. Currently everything is paper-based making it onerous to analyse. NZ is in a unique position where the Noise Induced Hearing Loss regulations provide an opportunity for us to be the world leaders in noise-induced hearing loss.

Questions on the proposed options

3. Do you think the use of ISO standards as the base for the age scale is appropriate?

Yes No Not Sure

Why/ why not?

[insert response here]

4. Do you have any evidence to support an alternative method for calculating the age scale?
Please provide specific evidence and data

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Moore recently presented some guidelines looking at and comparing a number of different methods for calculating Noise-Induced hearing loss. They discuss the issues with the old ISO standards. See reference below.

Using any other standard or method to inform “age-only” loss would negatively impact objective a (entitlements are targets at work-related hearing loss) and b (based on up to date scientific research). I have agreed with those objectives so I would thoroughly recommend the new ISO standards which include greater potential for informing the percentage of age related hearing loss based on the age-only percentiles added in the new ISO standard.

I agree that you should use the ISO standards, but how you use it is another story. You should be using these standards to the full extent, and using the information inside Moore’s guidelines to explore decision support tools that can be implemented at “point-of-care”. Currently AudioAccess has a working calculator that incorporates all the methods used to tease noise-induced hearing loss out of a total hearing loss, but these need to be tested to determine the most accurate and reliable methods to use.

Moore BCJ, Lowe DA, Cox G. Guidelines for Diagnosing and Quantifying Noise-Induced Hearing Loss. Trends Hear. 2022 Jan-Dec;26:23312165221093156. doi: 10.1177/23312165221093156. PMID: 35469496; PMCID: PMC9052822.

5. What is your preferred option?

Option 1 (Status Quo) Option 2 (proposed update) Neither No preference

Please provide the reasons for your view

As above.

Questions on the overall proposal

6. Are there any other impacts that may come about from updating the age scale that should be considered?

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Please provide evidence where possible

These changes provide an opportunity to create innovation tools that will improve the way providers assess individuals for Noise-Induced Hearing Loss. This requires development and implementation of digital evaluation tools that make accurate and reliable predictions. This puts Audiologists at the forefront, giving them the means to make better decisions upfront and reduce the decline rate, saving ACC considerable money and reducing the barriers and timeframe for claimants. If successful, it could also reduce the workload on Otolaryngologists where cases are clearly noise induced hearing loss and a decision can be made earlier.

Questions on additional amendments

7. Do you think the reference, within the Regulations, to tests conducted by otolaryngologists should be removed from the regulations?

Yes No Not sure

Why/ why not? (Please provide specific evidence where possible)

As you mention the changes bring the regulations in line with current practice.

8. Do you think the reference, within the Regulations, to AS ISO 8253.1-2009 should be updated to ISO 8253.1-2010?

Yes No Not sure

Why/ why not? (Please provide specific evidence where possible)

[insert response here]