PILBARA PORTS

WORK HEALTH AND SAFETY MANAGEMENT PLAN

A424462

TABLE OF CONTENTS

TABLES

WORK SAFETY AND HEALTH MANAGEMENT PLAN

1. CONTEXT AND SCOPE

The Pilbara Ports work health and safety (WHS) philosophy is based upon the Pilbara Ports values of Safety, Excellence, Teamwork, Integrity, and Care, and concepts of collaboration, participation, trust, individual responsibility and accountability. The success of WHS performance at Pilbara Ports depends upon the combined capability and contribution of all personnel, and Pilbara Ports promotes a highly visible, supportive and positive safety leadership style.

This Pilbara Ports Work Health and Safety Management Plan (WHSMP) documents the responsibilities of Pilbara Ports in meeting relevant statutory requirements, specifications and standards. It defines the WHS objectives for port operations and provides a framework for the implementation of the Pilbara Ports WHS Policy.

1.1 Organisational Context

Pilbara Ports encompasses the Port of Ashburton, Port of Dampier, Port of Port Hedland, Port of Varanus Island, and its Perth office. Activities within Pilbara Ports ports are undertaken under different contractual arrangements including: employees and contractors; licensees; port facilities operated under State Agreements; and port owned lands and facilities leased or operated by third parties.

The governing legislation applicable to safe operations at the port is the *Port Authorities Act* 1999 (PA Act), *Work Health and Safety Act 2020* (WHS Act), *Work Health and Safety (General) Regulations 2022* (WHS Regulations), *Australian Maritime Safety Authority Act* 1900 (AMSA Act), and *Dangerous Goods Safety Act* 2004 (DG Act).

1.2 Needs and Expectations of Workers and Other Interested Parties

Section 19 of the WHS Act requires that a person conducting a business or undertaking (PCBU) must ensure, so far as is reasonably practicable, the health and safety of:

- workers engaged, or caused to be engaged, by the person; and
- workers whose activities in carrying out work are influenced or directed by the person,

while the workers are at work in the business or undertaking.

This WHSMP provides a systematic approach to meeting these requirements and the expectations workers and other parties accessing Pilbara Ports sites to:

- safe workplaces, plant and systems of work.
- information, instruction training and supervision.
- consultation, cooperation and coordination.
- provision of adequate personal protective clothing and equipment to protect against hazards which cannot be eliminated.
- arrangements in place such that the use, cleaning, maintenance, transportation and disposal of plant, and the use, handling processing,

storage, transportation and disposal of substances are carried out in a manner such that workers are not exposed to hazards.

1.3 Scope

The Pilbara Ports WHSMP relates to all activities undertaken in port owned and controlled areas. It excludes those port facilities operated under State Agreements, and port owned lands and facilities leased or operated by third parties.

The scope includes matters of WHS, emergency preparedness and response, incident and disaster management, the prevention, management and rehabilitation of injuries and illnesses, and specific hazards and risks associated with the workplace.

1.4 WHS Management System

This WHSMP is supported by documentation which is intended to provide a coordinated and consistent approach to managing WHS risks. The documentation has been developed to comply with relevant legislation, Australian and International Standards and Codes of Practice where applicable to provide a minimum standard for the management of WHS.

The WHSMP is established and implemented under the requirements of AS/NZS ISO 45001:2018. It has been developed to include procedures and systems for the continued maintenance and development of the WHSMP in a continuous improvement cycle.

Pilbara Ports places a high value on the health and safety of personnel, and WHS is to be regarded as of the utmost importance in all port activities. WHS must be factored into the engineering and design of any projects, equipment and plant.

1.4.1 Integrated Management System

Pilbara Ports has established an Integrated Management System (IMS) which ensures effective interaction between core elements, including the continual review of compliance to AS/NZS ISO 45001.

Refer to the Integrated Management Systems Procedure (found on DMS under "Enterprise Risk/Procedures") for further information on the Pilbara Ports IMS.

1.5 Definitions and Terminology

Definitions and terminology used in this WHSMP are defined in Table 1.

Table 1: Definitions and Terminology

TERM	DEFINITION
Contractor	A party engaged under a contract to perform services, works, or supply goods to Pilbara Ports.

Licensee	An entity that is granted a Services Provider's Licence pursuant to the Port Authorities Regulations 2001 (Port Regulations) to perform the services on the terms, conditions and restrictions set out in the licence. Subject to the licensee's compliance with relevant operational provisions, the licensee will also be granted a right to access and right of entry through the Port as necessary to perform the services.
Management	Senior representatives with decision making responsibilities, delegated authority as managers in the Pilbara Ports organisational structure, and line management responsibilities.
Personnel	Pilbara Ports employees, licensees, and contractors.
Pilbara Ports Work Health and Safety Management System	Part of the Integrated Management System (IMS) which outlines Pilbara Ports requirements for organisational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing and maintaining the Pilbara Ports Workplace Health and Safety Policy, and so managing the safety and health risks associated with the business of Pilbara Ports.
Pilbara Ports Workplace Health and Safety Policy	Pilbara Ports' statement of commitment to the provision of safe and healthy work environments.
Visitor	A person who is signed in as a visitor at a Pilbara Ports site and typically has not completed the Pilbara Ports induction program and who is not engaged to participate in any work activities. They are escorted at all times by inducted personnel.
Worker	The definition of a 'worker' covers: • full-time workers on a wage or salary; • part-time, casual, and seasonal workers; • workers on commission; • piece workers; and • contractors and sub-contractors.

2. LEADERSHIP AND WORKER PARTICIPATION

2.1 Leadership and Commitment

The Pilbara Ports Board, Executive and senior management are committed to the provision of a safe and healthy work environment.

Pilbara Ports recognises that, so far as is practicable, the provision of a safe and healthy workplace is the responsibility of Pilbara Ports management.

Pilbara Ports is committed to comply with the WHS Act and to the standards of AS/NZS 45001: 2018 Occupational health and safety management systems (AS/NZS 45001).

While ultimate accountability for achieving these objectives lies with the Chief Executive Officer (CEO), for practical purposes, the responsibility for implementation of the Pilbara Ports WHS Policy is delegated to appropriate areas and levels of the business in accordance with the Pilbara Ports Corporate Authorisations Policy. Pilbara Ports is committed to allocating resources to ensure that its health and safety obligations are met.

Senior management are responsible for ensuring that the WHS Policy and objectives align with Pilbara Ports' strategic direction and that WHS processes are embedded into business processes through the IMS.

Pilbara Ports has established Health and Safety (HSE) Committees at Port Hedland, Dampier and Ashburton, and Perth sites and provides support and resources to ensure that they are able to function effectively.

Managers and supervisors at Pilbara Ports receive regular training to ensure that they understand their obligations in WHS including:

- communicating to workers the importance of effective WHS management and conforming with the Work Health and Safety Management System (WHSMS).
- ensuring the WHSMS is effective in achieving its intended outcomes.
- directing and supporting their staff to contribute to the effectiveness of the WHSMS.
- ensuring and promoting continual improvement.
- supporting other managers to demonstrate leadership.
- developing, leading and promoting a culture that supports the WHSMS.
- adopting a "no blame" solution focused culture to encourage workers to feel confident in reporting incidents, hazards, risks and opportunities.
- encouraging consultation and participation of workers in matters of WHS.

2.2 WHS Policy

Pilbara Ports has an WHS Policy signed by the CEO and Chair which details Pilbara Ports commitment to WHS. The policy is communicated to staff during inductions and is made available on Pilbara Ports external webpage and intranet. The current WHS Policy is shown in Figure 1.

Figure 1: Pilbara Ports WHS Policy

SAFETY, PEOPLE, AND ENVIRONMENT

Work Health and Safety Policy

Pilbara Ports is committed to a safe and healthy work environment for everyone.

Our safety mission statement, **Anchored in Safety,** reflects the value of safety being central in all aspects of our business.

To achieve this, Pilbara Ports:

- Identifies and holds *safety* as a value.
- Upholds a positive safety culture reflective of our *Safety Culture Framework*.
- Empowers workers and other persons to address and report all incidents and hazards promptly with transparency and *integrity*.
- Supports workers to understand their responsibilities for work health and safety and promotes *teamwork* across the organisation.
- Provides *care* to workers through an effective injury management and return to work process.
- Provides a work environment where physical and psychological hazards are eliminated or effectively controlled.
- Recognises the interplay between physical and psychological wellbeing and integrates its approach to achieve positive outcomes.
- Consults with workers and encourages participation in the development and continuous improvement of the work health and safety management system.
- Actively identifies hazards and applies the hierarchy of controls and demonstrates *excellence* when managing risk.
- Demonstrates commitment to safety through compliance with all relevant legislation, standards, codes of practice, and ISO 45001 Occupational Health and Safety Management Systems.
- Undertakes pre-employment medical assessments for employees as part of the recruitment process.
- Requires all workers to be fit for duty and present for drug and alcohol testing when requested.
- Builds worker capacity and capability by providing information, instruction, training and supervision.
- Strives for *excellence* by regularly engaging with workers, stakeholders and the community to continuously improve our safety culture and performance.

This Policy applies to the Pilbara Ports Board and all Pilbara Ports employees and other persons engaged by, and subject to, the direction of Pilbara Ports.

The Chief Executive Officer has overall responsibility for the implementation of this Policy.

This policy was approved on 19 September 2024.

Samuel McSkimming
Chief Executive Officer
19 September 2024

Karlie Mucjanko
Chair
19 September 2024

SAFETY | EXCELLENCE | TEAMWORK | INTEGRITY | CARE

This document is uncontrolled if printed or distributed electronically

2.3 Organisational Roles, Responsibilities and Authorities

2.3.1 Structure and Responsibility

The structure of Pilbara Ports is represented in the Pilbara Ports Organisation Chart. WHS responsibilities and authorities of relevant functions are documented in individual Job Description Forms (JDFs).

The successful implementation of this WHSMP requires a commitment from all personnel, who shall be aware of their roles and responsibilities in relation to WHS, as well as the risks and potential significant impacts related to their jobs.

All personnel have a responsibility for their own health and safety and for the health and safety of those around them. In addition to this, the CEO has delegated specific duties and responsibilities to several personnel to assist in ensuring the safety and health of all.

Pilbara Ports Staff HS Committees convene on a regular basis to assist in furthering the safety objectives of Pilbara Ports.

Pilbara Ports engages regularly with various users to ensure WHS objectives are achieved.

2.3.2 Key Safety Responsibilities

The Pilbara Ports Health and Safety Manager, as the process owner of this WHSMP and a member of the IMS Committee, must ensure compliance of the WHSMS with AS/NZS ISO 45001 by:

- ensuring that the WHSMS requirements are clearly established, implemented and maintained in accordance with AS/NZS ISO 45001; and
- reporting on the performance of the WHSMS to the Executive and Board, to allow for transparent review and the identification of potential improvements to the WHSMS.

Management must provide and maintain a workplace where personnel are not exposed to hazards by:

- promoting and requiring commitment and compliance with the Pilbara Ports WHS Policy and this WHSMP from all personnel.
- providing and maintaining safe workplaces, plant and systems of work.
- providing information, training and supervision to personnel to enable them to perform their work in a safe manner.
- communicating with all personnel on WHS matters in the workplace.
- providing personnel with personal protective equipment (PPE) to protect them against hazards that cannot be eliminated.
- providing for the safe maintenance, use and disposal of all plant.

- providing for the safe storage, use and disposal of hazardous substances.
- complying with the requirements of all statutory safety legislation where applicable.
- understanding and enforcing the WHSMP, ensuring safety risks are identified and reduced to so far as is reasonably practicable (SFAIRP).

Personnel at all levels shall assist in the prevention of incidents by:

- complying with the Pilbara Ports WHS Policy and this WHSMP.
- being responsible for their own health and safety and that of others in the workplace.
- keeping the workplace in a clean and tidy condition.
- not interfering with or misusing either personal or mechanical protective equipment that has been provided or installed for the purposes of health and safety.
- using personal or mechanical protective equipment issued or supplied as instructed, and seeking advice as needed.
- identifying, controlling and reporting all hazards in the workplace.
- reporting all incidents to the appropriate supervisor immediately.
- working in accordance with those relevant Pilbara Ports procedures and requirements which have been provided, to ensure the health and safety of all workers and others.
- complying with the requirements of all statutory safety legislation where applicable.
- understanding this WHSMP as it applies to their work activities, whereby no item of safety is ignored or deferred.

2.3.3 Vendor Management

Vendor Management is the coordinated business process that assists Pilbara Ports to seek advantages of and manage the introduced risks of external party engagement to provide labour, to construct assets, deliver goods or provide services. Pilbara Ports promotes a clear and consistent approach to Vendor Management.

Pilbara Ports' Vendor Management System Manual and Vendor Management Framework (found on DMS under Procurement) outline how Pilbara Ports manages its vendors (contractors and licensees).

2.4 Consultation and Participation

2.4.1 Staff Health and Safety Committee

Pilbara Ports Staff HS Committees provide a consultative forum to effectively address HSE matters, with particular reference to the WHS Act, AMSA Act, and any other legislation relevant to the port's operation.

This document is uncontrolled if printed or distributed electronically

Refer to Pilbara Ports Staff HS Committee Charter (found on DMS under "Health and Safety/Documents") for further information regarding the arrangements and functions of Pilbara Ports HS Committees.

2.4.2 Safety and Health Representatives

Pilbara Ports provides for the representation of workgroups by an elected colleague, or Safety and Health Representative (SHRep), as defined in the WHS Act. Workgroups shall be consulted to establish the demand for such representation, and elections, terms of office and functions of SHReps shall be carried out in accordance with the applicable legislation.

Refer to Pilbara Ports Safety and Health Representatives Terms of Reference (found on DMS under "Health and Safety/Guidelines") for further clarification regarding SHReps and their functions within the HSE Committee.

3. PLANNING

3.1 General

Management of WHS is taken into consideration in planning of all activities at the port including:

- strategic long-term planning – Pilbara Ports' strategic plans include WHS targets and objectives.
- project and construction work – Pilbara Ports requires contractors undertaking project and construction work to submit project specific WHS Management Plans and Risk Assessments for review prior to commencing works.
- maintenance activities – A range of tools are used during planning of maintenance activities to ensure WHS hazards are identified and managed. See Section 3.2.1 for details.
- operational activities – A range of tools are used during planning of operational activities to ensure WHS hazards are identified and managed. See Section 3.2.1 for details.
- Material work health and safety risks.

3.2 Hazard Identification

The identification and communication of hazards is the responsibility of all personnel who access port-controlled areas. Management must ensure that hazards with potential to harm personnel are identified, risk assessed and controlled.

Refer to the Hazard Management Procedure (found on DMS under "Health and Safety/Procedures") for the requirements for hazard identification and risk management.

3.2.1 Hazard Identification tools and methods

Pilbara Ports provides a range of tools to assist in the identification, assessment and control of hazards and risks pertaining to activities within the port.

A risk assessment framework is in place to provide for the efficient assessment of risks and allow for the implementation of controls commensurate with the level of risk identified. Pilbara Ports provides a range of tools to assist in the identification of hazards prior to commencing a task.

Hazards and risks are also identified through other means such as:

- throughout the course of a work activity.
- during workplace inspections.
- during pre-start inspections of equipment.
- through incident analyses.
- during auditing activities.
- via a range of other methods.

Identified hazards or risks are reported, assessed, communicated and controlled in accordance with Pilbara Ports procedures.

Refer to the Hazard Management Procedure and the Risk Register for further information.

3.3 Assessment and Management of Risk

Pilbara Ports has developed a Risk Management Procedure which aligns to AS/NZS ISO 31000:2009 Risk Management Principles and Guidelines.

Risks are rated based on the plausible maximum consequence (PMC) and likelihood of occurrence and risk tolerability criteria have been developed based on the PMC, risk rating and control effectiveness.

For further details see the Risk Management Procedure (found on DMS under "Risk and Audit/Procedures").

3.4 Opportunities

Pilbara Ports has established an Ideas Committee which is tasked with identifying processes to support an innovation culture. Personnel can submit ideas for opportunities through the Ideas Hub, accessible via Pilbara Ports' intranet page, which are then assessed by the committee.

3.5 Legal and Other Requirements

The WHS Act, and AMSA Act clearly establish the principals of control and duty of care as key foundations for safety responsibility. This WHSMP has been

developed to meet these legislative requirements and is in accordance with AS/NZS ISO 45001.

Pilbara Ports subscribes to relevant Safety Law databases with an automated notification function to indicate relevant changes.

Refer to Compliance Policy and Health and Safety Legal Requirements Review Guideline for further information.

3.6 Planning Action

CGR is Pilbara Ports integrated system for managing incidents, hazards, risks and actions.

3.7 WHS Objectives

Pilbara Ports' WHS objectives and targets for the 2024/2025 financial year are detailed in Pilbara Ports FY25 Deliverables and Priorities document.

4. SUPPORT

4.1 Resources

Pilbara Ports has a health and safety team as outlined in Pilbara Ports Organisational Chart.

The health and safety team are provided with a budget to allow activities required for the implementation, maintenance and continual improvement of the WHSMP.

4.2 Competence

4.2.1 Training

Pilbara Ports is committed to providing workers with the necessary training to perform their work safely and effectively.

Pilbara Ports requires that training arrangements for all personnel consider the best approach to learning for the intended audience, such as reading and writing ability, learning style, the suitability of the learning environment, and considerations for differing abilities, backgrounds, cultures, religious beliefs and ethnicity.

Refer to the Training Procedure (found on DMS under "People and Capability/Training") for further information about the identification, coordination and management of training for Pilbara Ports personnel.

4.2.2 Training Needs Analysis

A Training Needs Analysis shall be conducted on each individual role to identify mandatory training requirements, with consideration for the relevant Job Description Form and legislative requirements of the role or appointment.

4.3 Awareness

4.3.1 WHS Induction

All personnel working in port-controlled areas are required to complete the Pilbara Ports WHS Induction. This induction informs participants of the minimum safety, environmental and security requirements to gain access to Pilbara Ports ports.

4.3.2 Site Specific Induction

On completion of the WHS Induction, personnel shall be suitably inducted to their work area. They shall be informed of the hazards and controls, the location of firefighting and first aid equipment, and emergency response and evacuation procedures as a minimum.

4.4 Communication

4.4.1 Safety and Health Communication with Key Stakeholders

Communications between key stakeholders including Pilbara Ports, contractors and licensee personnel and management is facilitated through regular formal meetings.

Methods of communication include:

- Pre-Start/Handover Meetings.
- Toolbox Meetings.
- Pilbara Ports Staff HSE Committee Meetings.
- Strategic Risk Review Meetings.
- Integrated Management System Committee Meetings.
- Contract Management Meetings.
- Operations Meetings.
- Planning Meetings.

Refer to Pilbara Ports Stakeholder Engagement and Communications Strategy (found on DMS under "Corporate and Government Affairs/Plans") for information on Pilbara Ports framework for communications and stakeholder engagement planning and Pilbara Ports Communications Procedure (found on DMS under "Corporate Affairs/Procedures") for further information about the frequency and participants for meetings.

4.4.2 Change Notification

Management must ensure consultation with affected personnel or their representatives where there are any changes that affect workplace health and safety. Refer to Pilbara Ports Management of Change Procedure for more information.

4.5 Documentation

4.5.1 Training Register and Records

The People and Capability Department administers a training register which includes the mandatory training required for each position and has a

learning management system that records training undertaken by each worker and the relevant expiration dates.

4.5.2 Record Keeping

Management adopts a systematic approach to capture and manage all records.

Pilbara Ports WHS records shall be stored in accordance with the *State Records Act* 2000 (SR Act).

Refer to Recordkeeping Plan (found on DMS under "Information Services/Plans") for instruction in the management of Pilbara Ports records.

4.5.3 Document Control

Management employs a Document Control Procedure to manage all controlled documents, including (but not limited to) policies, procedures, standard work instructions, forms, manuals, plans and reports related to activities carried out.

Pilbara Ports documents are assigned a Process Owner within Pilbara Ports who is responsible for the adequacy and currency of the content and ensuring periodic review. They are accountable for notifying external parties affected by changes to documents within their responsibilities.

Refer to the Document Control Procedure (found on DMS under "Risk and Audit/Procedures") for further information on the processes for managing controlled Pilbara Ports documentation.

5. OPERATION

5.1 Eliminating Hazards and Reducing Risks

5.1.1 Fitness for Duty

Pilbara Ports commitment to fitness for work is documented in the Fitness for Duty - Drug and Alcohol Policy and Fitness for Duty - Fatigue Management Policy (found on DMS under "Health and Safety/Policies"). Fitness for duty incorporates (but is not limited to) the promotion of physical, mental and emotional health.

At the time of engagement, Pilbara Ports employees undergo a medical assessment to ensure they are medically fit to perform their role.

Whilst working at Pilbara Ports, workers must advise their supervisor of any pre-existing injury or illness which may affect their performance or has the potential to impact on safety and health in the workplace. A medical assessment may also be required to determine associated risks or limitations.

Pilbara Ports will ensure work activities do not aggravate a disclosed injury or illness or impact the safety and health of the workplace. Where

practicable, Pilbara Ports will identify alternate, modified or restricted duties.

Where alternate, modified or restricted duties are not practicable, a person may be instructed to take an absence from work in accordance with leave provisions, until medical clearance is obtained.

Licensee and contractors shall ensure the implementation of measures to comply with the Pilbara Ports fitness for duty policies.

Refer to sections 5.1.2 and 5.1.3 for relevant Policy and Procedure references.

5.1.2 Alcohol and Drugs

All personnel are required to undergo a pre-employment drug and alcohol test prior to commencing work with Pilbara Ports or in Pilbara Ports controlled areas. Personnel must not commence work if they are not fit for duty or if they are impaired by alcohol, illicit drugs or medication.

All personnel accessing port-controlled areas shall be subject to the Pilbara Ports alcohol and drug testing program, which incorporates random, blanket, for cause and for concern testing. Refusal to submit to testing shall be treated as a positive result, and disciplinary action taken accordingly.

Any personnel taking medication, including prescription and over-the-counter medications which may cause impairment, must inform their supervisor of the potential effects that medication may cause. Supervisors must monitor the person's fitness for duty and assign alternate duties wherever appropriate.

Refer to Fitness for Duty – Drug and Alcohol Policy and Fitness for Duty Alcohol and Drugs Procedure (found on DMS under "Health and Safety/Procedures") for further information.

5.1.3 Psychosocial Hazards in the Workplace

Psychosocial hazards at work are aspects of work and work situations which can lead to psychological or physical harm. These stem from:

- the way the tasks or job are designed, organised, managed and supervised
- tasks or jobs where there are inherent psychosocial hazards and risks
- the equipment, working environment or requirements to undertake duties in physically hazardous environments
- social factors at work, workplace relationships and social interactions.

Workplace psychosocial hazards are related to the psychological and social conditions of the workplace rather than just the physical conditions. These

This document is uncontrolled if printed or distributed electronically

include stress, fatigue, bullying, violence, aggression, harassment and burnout, which can be harmful to the health of workers and compromise their wellbeing.

Pilbara Ports has procedures, training and support integrated into its management system to assist with managing psychosocial hazards. These include

- Hazard Management Procedure.
- Training such as Working with Respect, Accidental Councillor and Hazard Management.
- Diversity and Inclusion Plan.
- Workplace conditions to support employee mental health and wellbeing (such as Work from Home and Individual Flexibility Arrangements Procedure, return to work plans, leave allowances, mental health days, domestic violence leave, Workplace Issue Procedure, rostered days off).
- Performance Development and Review Procedure.
- Promotion campaigns.
- Fitness for duty procedures.
- Discipline Procedure.
- Workforce Planning Procedure.
- Management of Change Procedure.
- Clear job descriptions.
- Employee assistance program.

5.1.4 Fatigue Management

Fatigue is defined as an impaired physical and/or mental condition that arises from an individual's exposure to physical and mental exertion and inadequate or disturbed sleep.

Pilbara Ports recognises that fatigue may arise from hours and patterns of work and activities, and travel/commute time. As it is also influenced by factors outside of work, such as family responsibilities, stress, lifestyle, personal health etc., the management of fatigue is a shared responsibility between management and the individual.

Refer to Fitness for Duty - Fatigue Management Policy and Fitness for Duty Fatigue Management Procedure (found on DMS under "Health and Safety/Procedures") for further information.

5.1.5 General Hazard Prevention

Pilbara Ports acknowledges the risk associated with port operations and provides for the reporting and rectification of hazards. Hazard management principles shall be applied in the consideration of controlling hazards and associated risks.

This document is uncontrolled if printed or distributed electronically

Refer to Hazard Management Procedure for further information.

(a)   Working Alone

Where personnel are required to work alone, the activities and conditions shall be risk assessed, and a safe system of work developed.

Refer to Working Alone Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(b)   Manual Handling

Where a manual handling task is required a risk assessment shall be completed to identify the hazards. The risk of injury should be assessed for each hazard, and appropriate controls implemented, including manual handling training as appropriate.

Management must ensure suitable powered mechanical plant or equipment and lifting aids are provided to enable personnel to avoid heavy manual tasks.

Employees shall undertake manual handling training biennially.

(c)   Ergonomics

All personnel must consider ergonomics when designing or arranging workstations, products and systems so that they fit the personnel who use them.

Management shall ensure that where ergonomic hazards are identified and pose a threat to personal safety, a risk assessment is completed by a competent person. Personnel shall be informed of the risks and provided with the necessary equipment and information to reduce the risk.

Special consideration should be given to ergonomics in confined spaces, awkward or difficult to access spaces, using heavy or awkward tools and equipment, and using repetitive or high force actions.

All personnel working at an office workstation should have a Workstation Risk Assessment completed upon commencement with Pilbara Ports.

(d)   Hygiene and Sanitation

Management must supply suitable facilities for personnel including:

o   Toilet facilities within a reasonable distance from each workspace.
o   Sanitation and hygiene facilities that are properly maintained.

- o Eating places that are dry, clean, well-ventilated and have adequate seating, tables, hand washing and waste disposal facilities.
- o Potable water supplies are available to all personnel.

Personnel must ensure their own hygiene at all times and must not intentionally pollute work areas or misuse or damage any sanitation or hygiene facilities provided.

(e) Infectious Diseases

Pilbara Ports has developed an Infectious Disease Preparedness and Response Guideline to:

- o Manage the potential impacts to the health and wellbeing of personnel associated with significant infectious disease outbreaks; and
- o Minimise the spread of seasonal illnesses within the workplace.

When an outbreak occurs, a response plan is initiated which includes:

- o Appointment of an Infectious Diseases Manager.
- o Monitoring of the disease outbreak.
- o Development and implementation of an event specific disease management plan.

For more information see the Infectious Disease Preparedness and Response Guideline (found on DMS under "Health and Safety/Guidelines").

(f) Occupational Hygiene

Management must ensure commitment to monitoring and reporting of occupational health hazards and hazardous occupational environments and implement controls to reduce risk in accordance with all applicable regulations and, wherever practicable, with regard to accepted best practices.

Specific occupational hygiene assessments must be conducted with reference to approved methodologies and applicable standards. Ongoing assessments shall be conducted and as required, controls implemented for the following occupational health hazards:

- o airborne contaminants such as metal dusts, respirable silica and asbestos fibres; and
- o occupational noise exposure.

Risk assessment, evaluation and control of occupational hazards may be undertaken in consideration of the following broad hazard categories:

- o chemical hazards – such as fumes and vapours.
- o physical hazards – those related to heat, cold, noise, vibration, ionizing radiation, ultra-violet light, and workplace lighting.
- o biological hazards – including mosquito borne viruses, potable water contaminants and other water borne hazards such as legionella.
- o ergonomic hazards – including manual handling hazards.

The variety of bulk products handled at Pilbara Ports requires that proponents and lease holders assess and communicate to Pilbara Ports, all potential occupational health hazards related to their products, prior to these products arriving at Pilbara Ports facilities, and on an ongoing basis by arrangement.

Pilbara Ports reserves the right to withhold access to facilities should occupational health risks associated with handling of particular products be unacceptable. The anticipation, recognition, evaluation, communication and control of occupational health hazards underpin the Pilbara Ports objective to protect personnel from occupational related injury, illness and impairment.

Refer to Pilbara Ports Health and Hygiene Management Plan (found on DMS under "Health and Safety/Plans") for more information on health and hygiene management.

(g) Hazardous Substances

Management must ensure the safe control of hazardous substances and reduce the level of exposure to personnel, property and the environment in accordance with the WHS Act and DG Act.

A risk assessment must be undertaken to assess the health risks to personnel. Health surveillance may be required to monitor the health of personnel who are at significant risk of exposure to hazardous substances.

Refer to Hazardous Substances and Dangerous Goods (Minor Quantities) Procedure (found on DMS under "Health and Safety/Procedures") for the requirements for managing the risks associated with hazardous substances and dangerous goods.

(h) Smoking

Management must provide a safe working environment by reducing the effects of Environmental Tobacco Smoke (ETS) to all personnel in accordance with the WHS Act and the *Tobacco Products Control Act* 2006.

Smoking in port-controlled areas is only permitted in designated smoking areas, identified with signposts. Designated smoking areas must be:

- o Located outdoors.
- o In well-ventilated areas with no possibility that the redundant smoke will contaminate indoor areas.
- o Located (where possible) away from pedestrian traffic areas and where personnel may be required to work.
- o Provided with cigarette butt bins to control litter and reduce potential fire risk.

Electronic cigarettes (e-cigarettes) and other personal vaporisers for delivery of nicotine or other substances are only to be used in the designated smoking areas.

Refer to Smoking in Designated Areas Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(i) Heat Stress

Management must undertake all necessary measures and precautions to ensure that workers do not suffer harm to their health from the adverse effects of extreme heat or cold.

If conditions in any workplace are, or are likely to be, hot and humid, supervisors must ensure that:

- o All workers are provided with instruction on measures to be taken to avoid any harmful effects from those conditions.
- o Appropriate workplace environmental controls such as ventilation and monitoring are implemented.
- o If appropriate, a program for monitoring the health of workers in the workplace is implemented.

Refer to Heat Management Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(j) Lightning

Management must manage risks associated with personnel being exposed to lightning. Lightning is extremely dangerous, and unnecessary exposure should be avoided.

Personnel must continually monitor their surrounds for changes to weather conditions and factor the difficulty of seeing conditions change or hearing thunder in a busy operational environment. Personnel must be prepared to respond to lightning immediately should an alert be received, thunder heard, or lightning observed.

Refer to Lightning Preparedness and Response Plan and Operational Procedure (found on DMS under "Health and Safety" under Plans" and "Procedures" respectively) for further information.

(k) Personal Protective Equipment (PPE)

Management must ensure that all personnel and visitors wear or use personal protective clothing or equipment provided if it is necessary to protect them from harm. Personal protective clothing or equipment must be properly fitted, and users instructed in their use.

All personal protective clothing and equipment supplied must conform to an applicable Standard, be properly maintained and, if it becomes defective, replaced.

All personnel must wear or use personal protective clothing and equipment where a sign is displayed to do so or as identified by risk assessment. All personnel must ensure that loose clothing, personal adornments, and hair are restrained to prevent entanglement with machinery, electrical equipment or other devices.

Refer to Personal Protective Equipment (PPE) Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(l) Hand Tools

Where personnel are required to use hand tools during their job, they shall be inspected before use to check for damage. Certain hand tools are prohibited from being used on Pilbara Ports sites, refer to the Prohibited Tools Register (found on DMS under "Health and Safety/Registers") for further information.

(m) Safety Signs

Management must ensure that sufficient safety signs are posted in workplaces and travel ways to prevent incidents, identify hazards, indicate the location of safety and fire protection equipment, and provide guidance and instruction in emergency procedures.

Safety signs must conform to AS 1319:1994 - Safety Signs for the Occupational Environment and must be placed so that they can be readily seen and maintained in a clean and readable condition. Personnel must not damage, deface or obscure a safety sign or remove a safety sign unless authorised to do so by management.

(n) Demarcation and Barricading

Management must ensure that hazards are sufficiently demarcated where the use of permanent fixtures is not practicable.

Refer to Demarcation and Barricading Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(o) Marine Operations

Pilbara Ports operates and manages marine operations under the PA Act and *Port Authorities Regulations 2001* as amended. Each port has an approved Port Marine Safety Plan and operates an authorised Vessel Traffic Service (VTS) Centre to oversee the safe conduct of marine operations within the VTS area.

All vessels shall comply with the requirements relevant to the vessel under the *Navigation Act 2012* or the *Marine Safety (Domestic Commercial Vessel) National Law Act 2012* as amended.

For information on the conduct of marine operations in each port refer to the relevant Port Handbook. All operations shall be conducted in accordance with the requirements of the license or contract.

(p) Fall Prevention

Management must ensure that all personnel undertaking activities where there is a risk of a person falling from one level to another do so in a controlled manner to reduce the risk of injury.

Specific regulations set out certain mandatory methods that are required to control the risk such as fall prevention systems, edge protection, and protection of holes and openings.

Refer to Working at Heights Procedure (found on DMS under "Health and Safety/Procedures") for further information.

(q) Working On, Over, In or Near Water

Management must manage the risk of drowning when personnel are required to work on, over, in or near water.

Refer to Working On, Over, In or Near Water Procedure (found on DMS under "Health and Safety/Procedures") for further information.

5.1.6 Task Specific Hazard Prevention

(a) High Risk Work

Management must identify High Risk Work, as detailed in the WHS Act, and implement a procedure or risk assessment specific to that task to ensure hierarchical controls are in place to eliminate, prevent or control the risk.

Management must ensure that personnel performing High Risk Work requiring a high-risk work licence, do hold a current licence in that particular class, and are competent in that particular High-Risk Work.

(b) **Electrical Work**

Management must ensure compliance with legislative requirements when undertaking electrical work as outlined in the WHS Act, the *Electricity (Licensing) Regulations 1991* (EL Regulations) and relevant Australian Standards.

All personnel required to carry out electrical work must be authorised to do so by a licence or permit under the EL Regulations.

An electrical logbook must be kept at each operational site to record plans, work carried out and other relevant information.

Electrical equipment must be provided with full current isolating devices capable of being secured in the isolating position wherever practicable. Where such features are not practicable, a risk assessment shall be conducted to establish suitable alternative controls, and outcomes communicated to impacted personnel.

Refer to Pilbara Ports Minimum Requirements for Electrical Contractors (found on DMS under "Maintenance/Documents") for minimum requirements for electrical work.

Refer to Isolation and Tagging Procedure (found on DMS under "Maintenance/Procedures") for the process for electrical isolations.

Refer to Electrical Testing and Tagging Procedure (found on DMS under "Maintenance/Procedures") for maintenance, testing and tagging information.

(c) **High Voltage Installations and Overhead Powerline Access**

Management must ensure compliance with legislative requirements for works in proximity of High Voltage (HV) Installations and Overhead Powerlines, as outlined in the WHS Act, EL Regulations, *Electricity Regulations 1947*, and relevant Australian Standards.

Management must ensure minimum clearances for the movement of vehicles and machinery under and in the vicinity of overhead powerlines, and for activities in powerline corridors.

Personnel must not work or operate plant in close proximity to HV installations and overhead powerlines unless authorised in writing by a HV operator nominated by the asset owner. In addition to Pilbara Ports requirements, personnel shall abide by the requirements of the asset owner where applicable.

Refer to High Voltage Access Procedure (found on DMS under "Maintenance/Procedures") when working or operating plant in close proximity to HV installations and overhead powerlines, and for

circumstances requiring the use of High Voltage Access Permit and Application to Work in The Vicinity of High Voltage Apparatus (both found on DMS under "Maintenance/Forms").

(d)   **Conveyor Systems**

Management must manage risks to health and safety associated with the design, installation and guarding of conveyors and conveyor systems in accordance with the AS1755:2000 Conveyors – Safety Requirements, with consideration for hazard management principles.

(e)   **Diving**

Management must ensure that all diving and diving construction operations are carried out in accordance with AS/NZS 2299 Occupational Diving Operations. Personnel required to conduct diving work must be appropriately qualified and undertake operations in accordance with the standard.

Refer to Working On, Over, In or Near Water Procedure (found on DMS under "Maintenance/Procedures") when undertaking diving activities.

(f)   **Scaffolding**

Scaffolding may be used for the purpose of supporting access or working platforms, personnel, plant or other material.

All personnel must comply with AS/NZS 1576.1:2010 Scaffolding – General Requirements when erecting, using or dismantling any scaffolding. Any erection or dismantling of scaffolding must only be carried out by a licensed person with a current Scaffolding Licence of the appropriate class.

Personnel erecting scaffold must ensure that an area where scaffold is to be erected is clear of rubbish and material or equipment not required for immediate use.

Management must ensure personnel are not required to use incomplete scaffold. Where incomplete scaffold is to be left unattended, danger tags, warning signs or other appropriate measures must be used to alert personnel and deter them from unauthorised access.

Management must ensure that welding of lugs and saddle pieces to steel structures that support a scaffold is done in accordance with AS/NZS 4576:1995 Guidelines for Scaffolding. Formal inspections and recordkeeping shall be in accordance with the same standard.

(g) **Confined Spaces**

Management must ensure that existing and new infrastructure is inspected for the purpose of identifying a confined space in accordance with the WHS Act. A risk assessment and rescue plan must be completed prior to entry.

Management must ensure that personnel do not enter or work in a confined space unless another person is present in the immediate vicinity outside the confined space, for the purpose of undertaking the duties of a stand-by person.

Personnel entering or working in and around confined spaces, and the manager or supervisor supervising and/or approving the tasks, must be competent.

Refer to Confined Space Entry Procedure (found on DMS under "Health and Safety/Procedures") for instruction on the competency requirements and processes associated with confined space entry and the management of associated hazards.

(h) **Excavation and Earthworks**

Management must ensure installation or provision of protective systems to protect workers from earth collapse or ground movement while working in and around excavations.

Personnel conducting excavations and ground penetrations 150mm or greater in depth (including installation of star pickets) require a Pilbara Ports Excavation Permit (found on DMS under "Maintenance/Forms").

The permit holder must ensure that the excavation and or related earth works are carried out in accordance with Code of Practice: Excavation, with consideration for identification for underground services, minimum benching requirements and appropriate barricading and safety signage.

Refer to Pilbara Ports Excavation Procedure (found on DMS under "Maintenance/Procedures") for excavation permit and process information.

(i) **Concrete Work**

All concrete works must be carried out in accordance with the Australian Building Code and AS 3850 Tilt-up Concrete Construction.

Management must ensure identification of all hazards associated with concrete work and implement appropriate controls to manage risk.

(j)   Hot Work

Management must ensure that all personnel undertaking hot work activities do so in a controlled manner to reduce the risk of personal injury or damage to plant or facilities resulting from fire and explosion.

Pilbara Ports employs a permit process for Hot Work activities conducted outside of designated hot work areas.

Hot Work performed on board vessels shall be in accordance with the vessel's Safety Management System.

Refer to Hot Works Procedure (found on DMS under "Maintenance/Procedures") for hot work permit and process information.

(k)   Spray Painting

Management must ensure that spray painting is done inside a booth that is designed, constructed, installed and maintained in accordance with AS/NZS 4114.1:2003 Spray painting booths, designated spray-painting areas and paint mixing rooms – Design, construction and testing, and with consideration for the appropriate Codes of Practice.

Where it is not practical to carry out the works inside a booth or the task is only minor, the task shall be risk assessed and alternative controls employed.

(l)   High Pressure Water Cleaning

Management must ensure all relevant hazards associated with high pressure water cleaning are identified, controlled and communicated to personnel in accordance with WorkSafe Code of Practice – High Pressure Water Jetting.

(m)   Abrasive Blasting

Management must implement controls to reduce the risks of hazardous chemicals, airborne contaminants and plant, as well as other hazards associated with the Abrasive Blasting activities such as noise and manual tasks.

Blasting cabinets must be used where possible and comply with requirements outlined in the WHS Act and *Environmental Protection (Abrasive Blasting) Regulations 1998* (Abrasive Blasting Regulations). Where blasting cabinets cannot be used, alternative controls must be put in place to reduce the risk of exposure of abrasive blasting to personnel and the environment.

Management must ensure that risks associated with the blasting media are considered and that the material complies with the

Abrasive Blasting Regulations, which prohibits the use of materials that contain:

- o 2% or more free silica (crystalline silicon dioxide); and/or
- o corrosion inhibitors containing chromate, nitrate or nitrite in wet abrasive basting.

Management must supply personnel undertaking abrasive blasting with an air-fed respirator which is fitted with an inner bib and shoulder cape, jacket or protective suit. Personnel must wear supplied PPE equipment when undertaking abrasive blasting.

Refer to the Abrasive Blasting Permit Application Form (found on DMS under "Environment and Heritage/Forms") for more information on abrasive blasting.

(n) Driving Safety

Management must ensure that personnel permitted to drive either a vehicle in Pilbara Ports controlled areas or a Pilbara Ports vehicle on public roads, hold a current driver Licence as per the *Road Traffic Act 1974* and comply with the relevant road rules for that class of vehicle.

All personnel driving vehicles on Pilbara Ports land must obey all traffic directions, drive to conditions, and in accordance with relevant Traffic Management Plans.

Refer to Port of Port Hedland – Traffic Management Procedure (Eastern Harbour Operations), Port of Port Hedland – Traffic Management Procedure (Western Harbour Operations), Port of Dampier – Traffic Management Procedure and Port of Ashburton – Traffic Management Procedure (found on DMS under "Landside/Procedures") for further information on driving on site.

Refer to the Travel Procedure (found on DMS under "People and Capability/Procedures") for information on remote driving.

(o) Plant and Equipment

Management must ensure all equipment, which in order to work requires a supply of energy, is managed in accordance with the WHS Act. Hazards arising from design, manufacture, erection and use of plant to which personnel who install, erect, use or dismantle plant are exposed to must be identified, recorded and controls implemented to manage the risk.

Records detailing tests, maintenance, inspection, commissioning or alteration of plant must be kept for all classified plant, industrial lift

This document is uncontrolled if printed or distributed electronically

trucks, presence-sensing safeguarding systems, vehicle hoists and any plant posing high risk hazards.

Management must ensure personnel are free from the risk of harm resulting from the uncontrolled release of energy. Plant and equipment must, wherever practicable, be positively isolated and stored energy released in a controlled manner by a competent person prior to inspection, repair, maintenance or cleaning.

Where isolation is not practicable, operational controls that permit controlled movement must be documented and approved in writing by the relevant department manager as appropriate, before commencing that task.

All personnel operating plant must hold a current high risk work licence as prescribed in the WHS Act, for the particular high-risk work performed.

Refer to Pilbara Ports Isolation and Tagging Procedure (found on DMS under "Maintenance/Procedures") for requirements for isolating plant and equipment.

Refer to Crane and Hoist Procedure (found on DMS under "Health and Safety/Procedures") for requirements for mobilising and utilising cranes, hoists and associated equipment.

(p) Domestic Animals and Pets
Due to the strict quarantine, health, safety and security requirements, domestic animals and pets are not to be bought onto site under any circumstances.

5.2 Injury Management

Pilbara Ports' commitment to prevent injury and occupational illness in the workplace and to manage both work related and non-work-related injuries and illnesses is outlined in the Injury Management Policy (found on DMS under "Health and Safety/Policies"). Pilbara Ports is committed to return workers to meaningful and productive employment at the earliest possible time and to comply with the requirements of *Workers' Compensation and Injury Management Act 2023* (WC Act).

Refer to Injury Management Procedure (found on DMS under "Health and Safety/Procedures") for requirements for the early reporting, rehabilitation and implementation of return-to-work strategies to assist an injured Pilbara Ports employee to make a timely and safe return to work.

Refer to Worker's Compensation Procedure (found on DMS under "People and Capability/Procedures") for the process for case management of Worker's Compensation for Pilbara Ports employees.

5.3 Management of Change

Changes that may impact on WHS performance are managed by the Management of Change Procedure. The procedure ensure that changes are authorised, assessed for potential risks, health, safety, community and performance levels are not compromised, changes are properly engineered, and that there is communication with affected groups.

5.4 Procurement

During procurement processes consideration is given to the suppliers, bids or tenders that will yield the least potential negative impact to the health and safety of personnel. Suppliers are required to conform to the relevant provisions of Australian Standards for OHS Management Systems including but not limited to:

- Evidence that they are systematically controlling risks associated with their products or services.
- Evidence that they have an acceptable OHS Policy and effective systems in place to manage OHS risks.
- Evidence that they have taken suitable steps to ensure the control of hazards/risks in relation to their services.

There is also a buy/hire quiet process in place to minimise hazards associated with occupational noise.

Further details can be found in the Procurement Procedure (found on DMS under "Procurement/Procedures").

5.5 Emergency Preparedness and Response

Management must identify all potential emergency situations, assess the risk of such emergencies occurring and document emergency response procedures for preventing and mitigating associated injury or harm, in accordance with the requirements of the following legislation:

- PA Act and regulations
- *Emergency Management Act 2005*
- WHS Act
- DG Act
- *Maritime Transport and Offshore Facilities Security Act 2003*
- *Navigation Act 1912*

Emergency response procedures shall be reviewed periodically.

Refer to DMS for Emergency Plans and Procedures.

6. PERFORMANCE EVALUATION

6.1 Monitoring, Measurement, Analysis and Performance Evaluation

6.1.1 Health Surveillance

Management must ensure that health assessments are carried out in respect of all personnel who engage in specific tasks with the potential for occupational exposure, if:

- an identifiable disease or other adverse effect on the health of the worker may be related to the exposure.
- there is a reasonable likelihood that the disease or adverse effect may occur under the particular conditions of work.
- there are recognised techniques for detecting indications of the disease or adverse effect.

OR

- personnel are exposed, or likely to have been exposed, to a hazardous substance in excess of the exposure standard for that hazardous substance.

Health Surveillance is carried out to monitor for possible health effects that may arise following occupational exposures at concentrations above accepted exposure standards. Where a risk assessment determines there is a reasonable likelihood that workers may be exposed to an occupational hazard at levels exceeding accepted values, management shall conduct specific health monitoring to assess actual exposures and the effects of these exposures on personnel.

Refer to Health Surveillance Procedure (found on DMS under "Health and Safety/Procedures") for health surveillance requirements.

6.2 Internal Audits

Internal health and safety audits are conducted in accordance with the Health & Safety Internal Audit Schedule, which is developed annually. Audit evidence is documented, and findings recorded in the Health & Safety Audit Report Form.

6.3 Pilbara Ports WHSMS Audit

Pilbara Ports has established, implemented and maintains an audit program and procedure for periodic WHSMS audits. Audits are carried out by a competent person, in order to determine whether the OSHMS:

- Conforms to AS/NZS ISO 45001.
- Is in line with the Pilbara Ports WHS Policy.
- Meets the objectives and targets for continual WHS improvement.

Refer to Internal Audit Procedure for the scope, frequency and methodologies of WHSMS and IMS auditing activities, and the competencies, responsibilities and requirements for conducting audits and reporting results.

6.4 Management Review

The Pilbara Ports Board establishes WHS Performance indicators on an annual basis and reviews them regularly. These performance indicators are monitored and communicated to personnel through regular meeting forums and in writing.

6.5 Workplace Monitoring

6.5.1 Workplace Inspections

Management must ensure that each work area is inspected regularly to ensure the work area is safe in accordance with the WHS Act.

Workplace Inspections must be undertaken to identify and rectify hazards, communicate hazard types and controls put in place, monitor the effectiveness of controls and identify means of eliminating or reducing risks. They shall be documented.

Refer to Workplace Inspection Procedure (found on DMS under "Health and Safety/Procedures") for the types and frequencies of workplace inspections required.

6.5.2 Calibration of Equipment

Management must ensure that equipment is maintained, inspected and calibrated in accordance with the WHS Act.

7. IMPROVEMENT

7.1 Incident, Nonconformity and Corrective Action

7.1.1 Incident Management

Management must ensure immediate response to and timely reporting, analysis and communication of all incidents which occur in areas under the control of Pilbara Ports.

All personnel have a responsibility to report all incidents regardless of severity, to their supervisor as soon as practicable.

All incidents shall be recorded in the approved incident reporting system and be analysed to a level commensurate with the actual consequence or plausible maximum consequence.

Corrective actions must be determined with consideration for the hierarchy of controls.

Refer to Incident Management Procedure (found on DMS under "Health and Safety/Procedures") for further information.

7.1.2 Preventative and Corrective Actions

Management monitors and measures the key characteristics of the operation and activities that can cause illness and injury, on a regular basis.

Refer to Nonconformity Procedure (found on DMS under "Risk and Audit/Procedures") for processes to be followed for improvement actions and prevention of reoccurrence of non-conformances.

7.2 Continual Improvement

Management regularly reviews and continually improves the Pilbara Ports WHSMS with the objective of improving WHS performance.

Refer to Document Control Procedure (found on DMS under "Risk and Audit/Procedures") for the requirements for process owners to periodically review approved documents to improve procedures and ensure compliance with current legislation.

Refer to External Document Control Procedure for the functions of subscriptions to legislative databases which provide management with automatic updates of relevant legislation.

Suggestions for improvement can be submitted to the Integrated Management System committee for review and action by completing an Improvement Form.

8. DOCUMENT OWNER

The Health and Safety Manager is responsible for this Management Plan.