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Document Title.	**Safety Management Plan**

Notes:

REVISION HISTORY

REV	DATE	DESCRIPTION OF CHANGE (S)	ORIGINATED BY	REVIEWED BY	APPROVED BY
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2	04/01/2015	General Review	M. Gianatti	Chris Nichols	Michael Eldrid
3	25/01/2016	General review and update	Tim Levy	Chris Nichols	Michael Eldrid
4	05/03/2020	Update to align to AS/NZS ISO 45001	Sheryl Kelly	Matt Neal	Matt Neal
5	05/06/2020	Review and update including new business name (SFM)	Michael Leeks	Matt Neal	Matt Neal
6	07/08/2020	General review and updates	Michael Leeks	Matt Neal	Matt Neal
7	06/04/2020	Review and update electrical tagging	Sonja Simpson	Michael Eldrid	Michael Eldrid
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9	12/12/2022	General Review update incl. HSEQ Documentation	Murdoch White	Ben Carruthers	B. Carruthers
10	29/04/2024	Full review – Change of Business Operations	Catherine Russo Robert Ker	Mitchell Buswell	Mitchell Buswell

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1 Overview

SFM Marine Pty Ltd (**SFM**) is committed to developing, implementing and maintaining a structured approach to work health and safety (**WHS**) in order to achieve a consistently high standard of safety and performance.

1.1 Purpose

The purpose of this Safety Management Plan (**SMP**) is to establish and maintain an effective WHS management system (**WHS-MS**). The SMP and SFM's WHS Policies and Procedures set out the safety arrangements and principles which are to be observed by SFM and its workers to ensure compliance with applicable legislation and to provide appropriate mechanisms for continuing consultation and management of WHS matters.

One of the key objectives of the WHS-MS is the avoidance of incidents and injury, but the system will not achieve this on its own. It requires the support, commitment and participation of all of us, and as such, it is expected that we will all work together to develop and implement safe working practices and to build a visible, supportive and positive safety culture.

1.2 Scope

The SMP applies to all workers and other persons at the following SFM operations where the listed activities are undertaken:

- Northport, 2 – 4 Sultan Way, North Fremantle Western Australia (WA)
  - Vessel Lifting, cleaning, hard standing and transport
  - Provision of work areas for vessel maintenance
  - Lease of Contractor Work Areas
  - Vessel docking and storage
  - Administration and Support

- Henderson Marina, 105 Clarence Beach Road, Henderson Western Australia (WA)
  - Vessel Lifting, cleaning, hard standing and transport
  - Provision of work areas for vessel maintenance
  - Vessel docking and storage

- The Boat Business Northport, 26 Rous Head Road, North Fremantle Western Australia (WA)
  - New engine supply
  - Repower and refit
  - Maintenance and repair
  - Emergency callouts and Offsite technical work
  - Warranty registration and repair

1.3 Communication of Plan

The General Manager and site supervisors are responsible for ensuring:

- Access to this SMP is communicated at Induction(s) and at regular intervals; and
- Any changes made to the SMP are communicated to affected persons on the site.

1.4 Supporting Management Plans

The following management plans have been developed to support the SMP:

- SFM-PLN-002 Environmental Management Plan
- SFM-PLN-009 Emergency Response Plan
- SFM-PLN-006 Traffic Management Plan

1.5 Legal Compliance

SFM is committed to conducting its business activities lawfully and in a manner that is consistent with its compliance obligations. For SFM's operations, some of the key applicable legislation includes:

- *Work Health and Safety Act 2020* (WA) (**WHS Act**)
- *Work Health and Safety (General) Regulations 2022* (WA) (**WHS Regulations**)
- *Dangerous Goods Safety Act 2004* (WA)
- *Health Act 1911* (WA)
- *Medicines and Poisons Act 2014* (WA)
- *Fire and Emergency Services Act 1998* (WA)
- *Fire Brigades Act 1942* (WA)
- *Road Traffic Act 1974* (WA)
- *Workers Compensation and Injury Management Act 2023* (WA)
- *Marine and Harbours Act 1981* (WA)
- *Port Authorities Act 1999* (WA)

SFM acknowledge that Australian Standards and Australian New Zealand Standards, Codes of Practice and Guidance Notes issued by regulatory authorities may also apply to the business from time to time.

2 Leadership and Commitment

The SFM Board and Management are committed to the provision of a safe and healthy work environment and ensuring that decisions are made using a risk-based approach.

SFM has a Health, Safety and Environment Policy that details SFM's commitment to WHS.

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3 Responsibilities

The successful implementation of this WHS-MS 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 work.

All personnel are responsible for understanding and complying with safety systems and processes and promoting safety consistent with SFM's values (Safety - lookout for your mates and yourself). Other key responsibilities include:

General Manager

- Ensure the compliance of projects and actions relating to identified safety issues affecting the business.
- Responsible for the overall implementation and maintenance of the SMP.
- Report all statutory notifiable incidents to the relevant regulatory authority.
- Reporting on the performance of the WHS-MS to the Board, to allow for transparent review and the identification of potential improvements to the WHS-MS.
- Ensure contractors engaged by SFM are qualified and that work will be conducted in accordance with the SMP and legislative requirements.

Operations Manager

- Ensure works are undertaken in accordance with documented requirements.
- Monitor compliance of workers and other persons attending SFM Sites with the SFM Site Safety Rules.
- Inspect the workplace to identify hazards before work commences and ensure all workers and other persons are aware of hazards controls, and simultaneous operations that may have impact on access, egress and workplace safety.
- Monitor the workforce and work areas for hazards and take immediate corrective action to rectify hazards.

HSES Advisor

- Participate in all operational risk assessments and assist the team in identifying and implementing appropriate controls.
- Ensure all workers and other persons attending SFM Sites are inducted.
- Review requests for specified works and ensure appropriate controls have been implemented.
- Monitor compliance of workers and other persons attending SFM Sites with the SFM Site Safety Rules.
- In conjunction with the team, monitor the effectiveness of the controls and improve where necessary.

- Understand and implement the SMP, and relevant documentation.
- Ensure that all incidents are reported, investigated and closed out in a timely manner.
- Ensure that vessel owners, contractors and suppliers comply with WHS and security requirements.
- Monitor contractor and supplier WHS performance.

Workers (including Contractors who carry out work in any capacity for SFM)

- Take reasonable care for their own health and safety while at work and that their acts or omissions do not adversely affect the health and safety of other persons.
- Comply with any reasonable instruction or direction given by SFM.
- Be familiar with and work in accordance with the SMP and SFM's policies, procedures, and requirements relating to WHS.

Contractors

- Work safely and include SFM workers and visitors in their safety plans.
- Comply with the requirements of WHS legislation and SFM's Site Safety Rules, SMP, policies, procedures and requirements applicable to the scope of work.
- Immediately advise the SFM HSES Advisor or other SFM personnel if an incident occurs in their area of work and conduct an appropriate investigation where required.
- Consult with SFM about safety matters and co-operate with SFM Management in implementing and achieving WHS goals.

Visitors

- Abide by SFM Site Safety Rules.
- Take reasonable care for their own health and safety and for the health and safety of other persons
- Comply with all reasonable safety directions provided by SFM.
- Immediately report all safety incidents to the SFM HSES Advisor or other SFM personnel.

4 Communication and Consultation

Effective safety management requires regular and ongoing communication between all parties. Suitable methods for communicating safety within SFM will be identified, implemented and reviewed.

4.1 Operational Meetings

Safety is included as a standing item to be discussed at operational meetings to ensure regular consideration and discussion of safety issues takes place.

SFM currently have the following regular meetings in place:

- Pre-start meetings
- Weekly Management meetings
- Monthly Operations Meetings which incorporate employee safety feedback.

4.2 Consultation and Participation

SFM will ensure consultation, cooperation and participation methods are established so workers and other duty holders are aware of safety matters relevant to them.

Consultation and participation of workers may take place in the following ways:

- Formal Inductions
- Monthly Operations Meetings
- On-site Training
- Provision of information about hazards
- Emergency Response training and drills
- Pre-start meetings
- Working groups established for specific safety matters
- Incident investigation and corrective actions
- Results of health and safety evaluations including audits, non-conformances
- Risk assessments, development of risk controls and feedback regarding long-term controls

4.3 WHS Issue Resolution

WHS issues arising in the workplace will be resolved in an efficient, timely and suitable manner to enable a safe and healthy work environment to be maintained.

Wherever possible, WHS issues will be resolved through consultation between all parties involved or affected by the WHS issue. This may include workers and their representatives. If the WHS issue cannot be resolved, then it can be referred to the SFM General Manager for resolution. Where the issue remains unresolved, the procedure for issue resolution set out in the WHS Regulations will be followed.

5 Planning and Risk Management

5.1 Hazard Identification

The process of hazard identification involves the determination of what, why and how things and situations in the workplace could result in injury or harm. Hazards generally arise from the following aspects of work and their interaction with each other:

- Physical work environment
- Equipment, materials and substances used
- Work tasks and how they are performed

- Work design and management

5.2 Risk Assessment

SFM utilise a Safety Risk Matrix to quantify the likelihood of a hazard resulting in an incident and the most likely consequence should an incident occur in order to determine a risk rating.

SFM has a Risk Register for its operations to ensure relevant work health and safety hazards are identified and control measures applied.

The Risk Register sets the minimum requirements for the identification, risk assessment and control and management of workplace safety hazards. The Risk Register will be maintained, reviewed and updated to ensure they remain adequate and relevant to the property.

5.3 Control of Hazards

All identified hazards will be managed in accordance with the hierarchy of controls. Wherever possible, the aim is to eliminate the risk, which is the most effective control. If this is not practicable, the risk will be mitigated through other alternatives (or a combination of alternatives) in the hierarchy.

Control measures are not mutually exclusive. Some circumstances will require the use of more than one control measure to reduce the level of risk exposure to personnel or the environment to as low as reasonably practicable.

5.4 Hazard Reporting

SFM adopt and utilise a good practice hazard management process, including the three key steps of hazard identification, risk assessment and hazard control.

All workers and contractors are encouraged to identify, report and correct hazards where practicable to do so.

Hazards that cannot be rectified immediately are to be controlled through the temporary use of barricades, warning signs, sentries etc. and reported to the HSES Advisor or delegate who shall initiate the appropriate action.

5.5 Standard Operating Procedures

SFM will develop workplace specific Standard Operating Procedures (**SOP**) for tasks and processes it undertakes that have the potential to cause harm to people, equipment or the environment. Where the requirement for a SOP is identified, a SOP will be developed using the SOP template in consultation with workers and maintained by those undertaking the activity.

5.6 Job Safety Analysis (JSA)

SFM will develop a Job Safety Analysis (**JSA**) for tasks it undertakes that are assessed to be high risk or no SOP exists prior to the work task being performed. Development of the JSA is to include consultation with members of the team that will be undertaking the task.

Once developed, the JSA can be reused for similar tasks, but needs to be reviewed to identify changed conditions and updated at the Pre-Start meeting prior to commencing work each time the task is undertaken.

Where previously unidentified or new hazards associated with a task are determined, the supervisor is to be contacted and the JSA is to be updated to eliminate or control that hazard.

5.7 Workplace Inspections

Workplace inspections will be undertaken at each SFM site on a regular basis.

Boat Stands in service will be formally inspected on a bi-monthly basis with the results recorded in SFM's safety management system, Safe-Ag.

6 Procurement and Change Management

6.1 Procurement Risk Assessment

Risk assessments will be conducted to ensure suitable hazard management practices can be put in place prior to significant changes to equipment, PPE, infrastructure or operational procedures. The nature of these assessments will be based on the nature of the item being procured as well as its intended use.

6.2 Change Management

At SFM, management shall review and where required, implement control changes regarding product and/or service provision. The review and change controls allow ongoing conformity with the company and stakeholder requirements.

SFM processes and procedures will undergo change over time. Management of changes will occur both proactively and reactively as circumstance dictates.

Proactive change may take place as a result of the following:

- System improvement opportunities are identified and acted upon
- Non-conformities are identified and corrective action taken
- New processes are added
- Processes are removed
- Any other proactive response deemed necessary by management.

Reactive changes may take place as a result of the following:

- Industry conditions/regulations changing enough to require modification
- Client / stakeholder requirements change resulting in adjustment
- Issues identified as a result of Incidents or emergency response
- Any other reactive response that requires a change or modification of management process.

In both reactive and proactive cases, SFM seeks to manage change in a controlled manner to ensure proper implementation of the changes.

7 Incident Management

7.1 Incident Reporting

All incidents (including near miss events), regardless of their outcome or severity must be reported as soon as practicable to SFM Management in Safe-Ag or using the SFM-FRM-009 Safety Incident Report Form.

Regardless of the actual outcome, incidents that lead to a Lost Time Injury (LTI) or had the potential for serious injury or property damage will be considered a Serious Incident. Serious Incidents are to be reported immediately to SFM Management once any immediate efforts to render first aid to injured persons and arranging medical treatment have been addressed.

7.2 Incident Investigation and Analysis

Reported incidents will be investigated at a level appropriate to the risks involved in the incident as well as the actual and potential consequences. Corrective and preventative actions are to be determined with consideration for the hierarchy of controls. The incident analysis and findings will be documented and any corrective or preventative actions tracked to closure.

Investigations should be documented in Safe-Ag or on the SFM-FRM-009 Safety Incident Report Form.

Incident Reports and Investigations will be reviewed by SFM Management to ensure that the factors and actions identified are suitable and to consider if there are learnings for other areas of the organisation that can be communicated.

7.3 Preservation of Incident Scene – Notifiable Incidents

In the event of an incident involving serious injury, illness or death of a person or which is a dangerous incident for the purposes of the WHS legislation (which includes, for example, actual or potential electric shocks and fall of objects from height), the site must not be disturbed in any way other than to assist an injured person, make the site safe or minimise the risk of a further incident or prevent further injury.

7.4 Statutory reporting

SFM will ensure the timely reporting to the relevant regulatory authority of any safety incidents required under WHS legislation.

8 Emergency Preparedness and Response

SFM commits to preparing for potential accidents and emergency situations that may lead to significant business, WHS impacts and recovery to support critical functions of SFM. An

Emergency Response Plan has been developed for SFM Sites which shall be reviewed periodically. Refer to SFM-QHSE-0107 Emergency Response Plan.

8.1 Emergency Equipment

All SFM workplaces will have suitable emergency equipment provided, including fire detection, fire suppression, first aid kits and other emergency equipment as required. This equipment will be regularly inspected, tested and maintained.

8.2 Provision of Fire Control Systems and Emergency Warning System

SFM will ensure that suitable fire control systems (e.g. smoke detectors) and equipment (e.g. fire extinguishers) are provided in accordance with applicable Legislation, Building Codes and relevant Standards.

Regular testing of the fire warning system and alarm system is to be conducted and recorded.

Any impairment of the fire systems is to be reported immediately to SFM Management for repair.

Fire control systems and emergency warning equipment will be inspected, tested and maintained on a regular basis in accordance with relevant Legislation and Standards. Systems and equipment will only be maintained by a suitably competent person. Records of inspections and maintenance activities will be maintained.

9 Health and Welfare

9.1 First Aid

SFM will adopt a risk based approach to ensure the provision of a prompt, coordinated first aid response, including the following considerations:

- Identify and assess the potential for an injury/incident occurring;
- Determine suitable resources based on the nature of the work, hazards, size and location and number and composition of persons at the workplace, including:
    - Type, contents and number of kits;
    - Number and location of First Aid Officers (FAO); and
    - Appointing, training and replacing FAO's as required.
- FAO training will be provided by a Registered Training Organisation.

9.2 Injury Management and Return to Work

Injuries requiring medical attention beyond first aid will be referred for appropriate medical treatment.

Effective injury management commences immediately after the occurrence of the injury and includes the following:

- Counselling of the injured person by site personnel;
- Where applicable, referral to the SFM nominated medical practitioner;
- Workers who have been certified as fit for restricted / alternate duties or unfit for work will be monitored by the HSES Advisor;
- Provision of restricted and meaningful duties, where appropriate and safe to do so;
- Follow up, including personal off site visits by the HSES Advisor (where required).

Refer to SFM-PRO-003 Injury Management Procedure.

9.3 Fitness for Work

All persons who are directed, engaged and/or nominated to undertake tasks at SFM are subject to fitness for work requirements. SFM maintains the right to request any person to leave site or refuse work to any worker or contractor who, in the opinion of management, is in an unfit state to perform their work in a safe manner.

To assist in these requirements, SFM workers, contractors and visitors shall observe:

- No alcohol or illicit drugs may be consumed or permitted on SFM Sites at any time without management approval;
- Workers must not commence work if they are not fit for duty or if they are impaired by alcohol, illicit drugs or medication;
- Workers must not drive a personal or organisation vehicle on work related business where the person would breach applicable road transport law by driving under the influence of alcohol or other drugs; and
- Workers who are taking prescription medication that may affect their safety at work (or cause drowsiness) are to inform their supervisor of the circumstances so that appropriate duties may be assigned.

9.4 Psychosocial hazards

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

SFM shall develop procedures, training and support integrated into its WHS-MS to assist with managing psychosocial hazards.

9.5 Smoking

Smoking is not permitted in any building, room, vehicle or enclosed space on site.

Smoking and use of electronic cigarettes (e-cigarettes) and other personal vaporisers for delivery of nicotine is only permitted within the designated smoking areas, where signposted, and can only be undertaken during designated break times.

9.6 Occupational hygiene

Management must ensure commitment to monitoring and reporting of occupational health hazards and implement controls to reduce risk in accordance with relevant Legislation and, wherever practicable, with regard to accepted best practices.

Assessments shall be conducted and, as required, controls implemented for the following occupational health hazards:

- airborne contaminants such as dusts, fumes, vapours and gases; and
- occupational noise exposure.

Controls may include undertaking painting and fibre glassing only in designated area(s).

No angle grinding will be carried out on materials which contain synthetic mineral fibres (glass fibre, ceramic fibres, lead, etc.) without approval of SFM management.

When cutting or grinding concrete, bitumen or other potential dust producing material using a diamond or abrasive wheel cutter, water will be used to suppress the dust and respiratory protection will be worn.

9.7 Heat Stress

SFM will 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 on site are, or are likely to be, hot and humid, supervisors must ensure that:

- During pre-start meetings, workers are educated and reminded of the risks associated with over exposure to heat and strong sunlight;
- Workers are provided with instruction on measures to be taken to avoid any harmful effects of those conditions such as additional personal protective equipment and sunscreen; and
- Appropriate workplace environmental controls, such as ventilation and monitoring are implemented.

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10 Key Safety Management Processes

10.1 Specified Works

In accordance with the Site Safety Rules, contractors shall only undertake the following works following prior notification and approval of the SFM Operations Manager (or Delegate).

- Painting Preparation and Application
- Dry Sanding
- Grinding
- Cranage and Lifting
- Powered Mobile Plant
- Confined Space Entry
- Hot Work
- Bunkering and de-bunkering

Prior to the approval being given to undertake the above types of work, the contractor shall be able to demonstrate a documented safe system of work which includes any necessary containment or controls to protect the safety of third parties accessing or working on SFM Sites.

10.2 Housekeeping

SFM recognise that a clean and orderly site is required to enhance production efficiency, foster site safety and minimise pollution. This can be achieved through:

- Keeping materials secure to prevent them from being accessed and misused by unauthorised personnel
- Keeping access routes clear, especially near public areas
- Use of waste bins
- Recycling
- Clean up of spills
- Cleaning of facilities and amenities
- Undertaking regular workplace inspections and actioning any identified issues

10.3 Traffic Management

SFM will implement strategies to minimise the risk of worker injury from traffic interactions including:

- Developing and implementing a Traffic Management Plan;
- Designating responsibilities for people managing or interacting with traffic on site;

- Developing control measures for expected interactions (including temporary hazards) where operations/work activities force changes to the flow of either pedestrian, or other traffic;
- Instructions/procedures for controlling traffic (including emergencies).

SFM will implement a Traffic Management Plan for each site that will indicate vehicle movement paths, work areas, parking and other relevant information.

The vehicle speed limit on sites is 5km/h, which is a walking pace.

10.4 Barricading

All works that have the capacity to create dust or overspray must be fully encapsulated or sufficient barricades put in place to ensure no dust or paint overspray leaves the designated work site.

10.5 High Risk Work

Before the commencement of any identified High Risk Work, a risk assessment or procedure specific to the task must be undertaken, in consultation with relevant workers, to ensure hierarchical controls are in place to eliminate, prevent or control the risk.

Management must ensure that workers performing High Risk Work requiring a high risk work licence, hold a current licence in that particular class, and are competent in that particular High Risk Work. Records of High Risk Work licenses will be maintained by SFM.

10.6 Mobile Plant

Plant will only be operated by personnel with the necessary licences, training and or competencies as identified in WHS Regulations.

The safe operation of mobile plant must consider the following in risk assessments and Safe Work Method Statement (**SWMS**):

- The Original Equipment Manufacturer's manual
- Relevant Codes of Practice

Mobile Plant operated on site must be in good working order and within current third party certification, where required.

Contractors must inform SFM prior to the mobilisation and use of powered mobile plant. Powered Mobile plant shall be transported in accordance with relevant Traffic Management Plan.

10.7 Fall Prevention

SFM will ensure as far as reasonably practicable that hierarchical controls are in place to eliminate, prevent or control the risk of injuries caused by falls.

In consultation with relevant workers, SFM will identify tasks that have a potential for falls and falling objects. Periodic inspections of the workplace will be conducted to identify fall risks (including elevated falls, falls into void/pits, falls on the same level and falling objects).

10.7.1 Platforms, Stairways and Guardrails

Fixed platforms and stairways must comply with the relevant Standards and Codes of Practice.

Handrails and guardrails must comply with the relevant Standards for height and also have a kickboard panel installed where appropriate, to prevent dropped falling items through the gap.

10.7.2 Ladders and Scaffolding

Ladders must meet the relevant Standards and be inspected prior to each use to ensure no damage has been sustained and that the treads and steps are free of slip hazards.

All workers must comply with relevant Standards and the WHS Regulations when erecting, using or dismantling any scaffolding. Scaffolding may only be erected, modified or dismantled by a suitably qualified and licensed person where over 4 Metres in height in accordance with the WHS Regulations.

Completed erected scaffolds will be supplied with a SCAFFTAG Handover certificate, completed by the competent scaffold person. Access and work may only be undertaken on complete scaffolding, except for the act of erecting and dismantling the scaffolding.

10.7.3 Elevated Work Platforms (EWPs) and Scissor Lifts

EWPs and scissor lifts may only be used by competent persons and must be inspected prior to use. EWPs must be used in conjunction with a suitable fall arrest device and a dedicated, competent EWP spotter.

Scissor lifts do not require fall restraint devices to be worn during operation, but workers are to remain within the confines of the working platform and undertake work in accordance with the associated SOP.

10.8 Boating Lifting Cranes

A prestart inspection shall be undertaken by a competent person on all boat lifting cranes, including the gantry crane, prior to use.

Boat Lifting Cranes shall be serviced and maintained as specified in the manufacturer's manual. All servicing will be completed in accordance with the manufacturer's specifications.

Boat lifting slings and other lifting equipment shall be inspected prior to use and will be inspected by a competent person on an annual basis or in accordance with relevant Standards, whichever is sooner. All rigging and lifting equipment will be colour coded and tagged, with these details recorded in a register.

Only SFM approved operators who have been assessed as competent are to operate the boat lifting cranes. As there is no Registered Training Organisation which conduct a nationally accredited course for boat lifting, Travel Lifter Operators are trained by current experienced and competent SFM workers or other external training entities.

10.9 Boat Stands

Boat stands shall be installed, maintained, and removed in accordance with the SFM-SOP-001 Marine Straddle Carrier Safe Operating Procedure.

Boat stands will be inspected immediately prior to being placed into service and then periodically when installed. Any stands showing signs of damage or excessive wear shall be removed tagged out of service.

Workers shall complete training in the boat stands prior to working on or inspection of the boat stands.

10.10 Confined Spaces

All entry points to confined spaces will be suitably signposted to warn workers of the presence of a confined space and specify that entry is only allowed with a confined space permit.

Where reasonably practicable to do so, physical lockable guarding or barriers will be used to prevent unauthorised access to confined spaces.

10.11 Electricity

10.11.1 Authorised Persons only to Conduct Work

Electrical work can only be carried out by authorised, licensed and qualified persons for the scope of work they perform and in accordance with relevant Legislation, Standards and Codes of Practice.

All electrical plant and equipment is to be inspected, tested and tagged and maintained by a competent person in accordance with the relevant Legislation.

10.11.2 Provision of Residual Current Devices (RCDs)

Residual Current Devices (RCDs) are installed on all circuits where there is a risk of workers coming into contact with metal objects. All RCDs are to be tested and tagged on a regular basis and the results of these tests recorded. Logbook records are to be available for inspection.

10.11.3 Live Work Prohibited

Under no circumstances will electrical work be carried out on electrical installations, distribution systems, plant or equipment unless it has been isolated and de-energised.

10.11.4 Out of Service Tags

Any person may place an Out of Service tag on an item of equipment that they believe may be faulty or removed from service. The person attaching the tag is responsible for informing supervisors or management of the tag by completing a Hazard Report in SafeAg.

An Out of Service tag can only be removed by the authorised person effecting repairs, or by a supervisor/manager (a competent person) who has satisfied themselves that the equipment is in a safe and useable condition.

10.12 Plant and Machinery

10.12.1 Inspection and Assessment of Plant and Machinery

Plant and machinery will be inspected on a regular basis to ensure the equipment is operating safely and that any safety controls, such as guarding and emergency stops, are working

correctly. These inspections will be conducted by a suitably competent person, and records of the inspections detailing any activities or actions will be kept.

10.12.2 Guarding

All machinery will have suitable guarding installed as per the manufacturer's recommendations, requirements of Legislation and the relevant Standards. Guarding will be inspected as part of the regular inspection and maintenance activities. Guarding may only be removed when the machinery or equipment has been suitably isolated.

10.12.3 Worker Training and Competency

Only workers who are undergoing supervised training, or who have been trained and deemed competent are permitted to use fixed/mobile plant and machinery. Records of any training and assessments of worker competency will be maintained.

Workers operating vehicles or mobile plant must possess an applicable licence to operate that item of equipment.

10.12.4 Pre-Start and Maintenance Records

SFM shall ensure that all plant and equipment used in performance of work is inspected prior to operation.

Pre-start checks will involve a visual inspection of the equipment prior to operation. Inspection checklists relevant to specific items of plant will be developed to assist workers in undertaking these inspections.

Any faults that are detected must be reported to the supervisor or SFM HSES Advisor and the plant should not be operated until the fault is corrected unless approved by the HSES Advisor following a document risk assessment.

A maintenance schedule will be developed for the regular servicing of mobile plant, equipment and vehicles. Maintenance will only be carried out by suitably competent persons on plant and machinery that has been isolated. No unapproved modifications may be made to mobile plant, equipment or vehicles.

Records of all maintenance, servicing and pre-start checks will be kept.

10.12.5 Refuelling

Only suitably competent personnel are to undertake refuelling of plant or vessels and dispensing of fuel to containers. Refuelling will be conducted at a safe distance from combustible material, sources of heat and sources of ignition.

10.13 Hot Work

Hot work must only be carried out by suitably competent workers. Hot work includes tasks that create heat as a product of the work process, such as welding, cutting, grinding and heat treatments. SFM employs a permit process for Hot Work activities and require a permit to be approved before Hot Work activities commence.

Where a risk assessment identifies the potential for a fire risk, suitable controls will be implemented to eliminate or mitigate the risk. Contractors engaged to perform hot works on site are required to use suitably rated and serviced fire prevention and extinguishing equipment, where applicable.

10.14 Inclement Weather

Both supervisors and workers performing tasks, such as high risk activities or tasks generating dust, need to be aware of any hazards associated with changing weather patterns and take appropriate action to minimise these risks The appropriate action will vary depending on the location, tasks being performed and the change in the weather, for example high winds, rain, thunderstorm activity, extreme hot or cold conditions. . This may include moving the location of the task or deferring the task to perform the work in the best possible weather conditions.

10.15 Hazardous Chemicals and Dangerous Goods

SFM will ensure a systematic approach to managing health and safety risks associated with hazardous chemicals and dangerous goods.

Hazardous chemicals are chemicals, organic matter and other substances which pose a health risk when people are exposed to them. This may include paints, solvents, corrosives, adhesives, thinners, cleaning solutions, chemicals, flammable and dangerous goods. Dangerous goods are hazardous substances that are also explosive or flammable in nature with storage required that is fit for purpose.

10.15.1 Chemical management

A hazardous chemical register will be developed to record any hazardous chemicals purchased or used by SFM. This will be reviewed on a regular basis.

A Safety Data Sheet (**SDS**) relevant to hazardous chemicals in the register will be readily accessible to any worker who uses or may be exposed to a hazardous chemical.

Where hazardous chemicals not listed on the register are required for use on site by Contractors, before bringing or using that chemical on site the Contractor shall provide the name of the hazardous chemical, quantity, SDS and storage requirements to SFM.

10.15.2 Safe Handling, Use and Storage of Chemicals

All workers who use or may be exposed to hazardous chemicals will be made aware of the hazards associated with their use. All chemicals must be stored and handled in accordance with the instructions or requirements on the SDS and the SFM-REG-004 Hazardous Substance Risk Assessment.

Wherever possible, devices to ensure the safe pouring of substances should be used to prevent spills, splashes and exposure.

SFM will review risk controls if there are amendments to SDS, changes to work practices with hazardous chemicals, substance and Dangerous Goods or if health monitoring results indicate exposure, atmospheric monitoring reveals concentrations have exceeded the exposure standard for the chemicals.

All Dangerous Goods are to be stored in accordance with legislative requirements.

10.16 Manual Tasks

Manual tasks refers to any activity requiring the use of force exerted by a person to lift, push, pull, carry or otherwise move or restrain any object. Manual tasks may stress or strain the

body when the force required exceeds the capacity of a person to safely provide it, or where the activity is improperly undertaken.

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.

10.17 Safe Working Around Water

Where an activity involves the risk of a worker, contractor or customer falling into water, a suitable risk assessment shall be completed.

10.18 Personal Protective Equipment

Personal Protective Equipment (**PPE**) may be required to protect workers and other persons during general, specific and hazardous tasks where other hazard control measures are not suitable or adequate to manage hazards.

If required, workers are obliged to use PPE when required and when reasonably practicable. At a minimum, workers on site are obliged to wear:

- enclosed shoes or safety boots at all times;
- high vis in all operational areas; and
- personal protective clothing or uniform when in the workshops or yards.

Additional PPE such as safety glasses, gloves, respiratory protection, hearing protection, hard hats and specialised protection may be required for specific tasks or when working in designated areas.

Other requirements include:

- workers should be trained in the safe use, storage and maintenance of PPE;
- PPE must be checked before use for the correct type, fit and undamaged; and
- store PPE correctly.

10.19 Waste Management

SFM separate waste for recycling or disposal. Small portable containers collected from around sites will be disposed of into labelled bulk containers prior to collection by third party contractors.

Generated waste may include but is not limited to:

- General dry, inert, solid Fabrication waste
- Pallets capable of being reused
- Hazardous waste such as batteries, paint, used oils and fluids
- Spilt oils, fluids and chemicals for treatment
- Prescribed waste

- Recyclable waste such as scrap metal, paper, glass and aluminium

All waste will be contained to prevent unintended dispersal and each consignment of waste shall be segregated into the above groupings and accompanied by a traceable waste consignment note.

Waste streams, quantities and consignment note details shall be recorded and available to nominated SFM representatives on request.

All waste management procedures are to be compliant with the SFM-PLN-004 Waste Management Plan.

11 Inductions and Competency Requirements

11.1 Competency and Awareness Requirements

All workers are to be competent in managing the site specific WHS risks within their scope of work. Where required, SFM will ensure that workers hold a relevant certificate of competency to perform their work safely. Where a formal certificate of competency is not required, SFM may undertake internal assessments, supervision and observations to ensure workers are competent in their tasks.

11.2 Training Identification and Records

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

SFM will ensure its workers are suitably trained and qualified on the basis of appropriate education, training or experience (competency) as is necessary to meet the critical success factors of their assigned roles. Records of training conducted, copies of licences and certificates and other applicable evidence of training, assessments and competencies of personnel shall be maintained.

11.3 Safety Inductions & Site Safety Rules

SFM has developed and implemented safety inductions (a full induction and a visitor induction) detailing the minimum WHS requirements to access the site. An induction must be completed prior to undertaking any works on site, in addition to signing a copy of the Site Safety Rules.

The induction will inform workers, contractors and visitors (including a vessel owner or customer) of the hazards, controls and procedures in place to ensure maintenance of a safe workplace. Upon arrival on site, a site orientation including location of amenities, first aid kits, chemical storage and restricted or designated areas will be conducted prior to commencement of any work.

12 Contractor and Visitor Management

All contractors engaged to perform work on SFM Sites are required to comply with relevant Legislation, Standards, Codes of Practice and SFM policies, plans and procedures.

12.1 Contractor selection

When selecting a contractor, SFM will undertake a risk based evaluation of the contractor's ability to carry out the work safely. Where contractors are used only periodically, the evaluation and selection of approved contractors can be undertaken and placed on file.

Prior to the allocation of contracts, prospective contractors may be requested to:

- Supply copies of relevant permits, licences, certificates;
- Supply public liability insurance information and other insurances as relevant;
- Demonstrate understanding regarding all SFM health and safety protocols;
- Provide evidence of marine trade qualifications; and
- Undertake the SFM Induction (electronically or manual presentation).

12.2 Contractor management

Management of contractors will contain the following steps:

- Only approved SFM contractors allowed on site;
- Developing the contract specifications;
- Ensuring a safe system of work is in place for the contracted works;
- Ensuring the contractor completes an induction; and
- Monitoring and evaluating the contractors' performance as appropriate.

12.3 Contractor Safety Plans and Practices

Contractors, as requested, will be required to provide, implement, maintain and comply with safety management plans or procedures detailing the way in which contracted works will be performed safely on site. Their safety plans or procedures will be:

- Determined at the selection and engagement stage;
- Referenced in the applicable contract or agreement;
- Relative to the size, duration, type of work or hazards and risks involved; and
- Relative to the capacity of the contractor to control the works.

12.4 Visitor Management

Visitors shall undertake a visitor induction prior to entering the site and must wear an orange visitor vest.

12.5 Vessel Owners

Vessel Owners are responsible for ensuring that any contractors they engage can demonstrate safe systems of work, have insurances in place and can provide the following (as requested) to SFM prior to commencing works:

- Risk assessments for work being conducted;
- Safe work procedures or SWMS (as appropriate);
- Copies of qualifications, licences or competencies for workers (if required); and
- Insurance documentation such as Public & Products Liability, Motor Vehicle and Workers' Compensation.

13 Auditing and Review

SFM is committed to assessing compliance of its business activities with the requirements of the WHS-MS and relevant legislation and Standards to ensure that the system is effectively implemented and maintained and identify any areas for improvement.

13.1 Audit

Safety audits of SFM will be conducted periodically,

including in the event of an incident, non-compliance or for other valid reasons.

All audit findings and results will be documented and any identified actions addressed.

13.2 Review

SFM Management is responsible for the periodic review of the WHS-MS to ensure its continuing suitability, adequacy and effectiveness. In order to assess compliance, regular inspections and a periodic management review assessment will be undertaken to review all safety actions and determine ongoing opportunities for improvement.

This will be documented to ensure any matters concerning safety within the worksite is addressed.