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CS ENERGY PROCEDURE

CHAIN OF RESPONSIBILITY, HEAVY VEHICLE OPERATIONS CS-OHS-78

Responsible Officer: Health and Safety Business Partner
Responsible Manager: Head of Health and Safety
Responsible Executive: Executive General Manager Plant Operations

Document history

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1 PURPOSE

This Chain of Responsibility (CoR) procedure applies to all heavy vehicle activities over 4.5 tonnes gross vehicle mass and any person involved in transport activities at CS Energy sites where products, goods or materials are received or dispatched via heavy vehicles. The aim of Chain of Responsibility (CoR) is to make sure all personnel in the supply chain share the responsibility for ensuring breaches of road transport laws do not occur.

The requirements of this procedure are defined by the Heavy Vehicle National Law (HVNL).

CS Energy will achieve compliances to this legislation by allocation of responsibilities to designated roles and implementing a risk management processes to identify and control health and safety risks arising from its transport activities.

2 SCOPE

This procedure applies to all employees, contractors and organisations who work for CS Energy. By law, each person identified in the supply chain must take reasonable steps to ensure a heavy vehicle driver can perform their duties without breaching road transport laws.

3 OVERVIEW

CoR is a requirement of legislation which imposes responsibilities and systems for the safe loading and movement of loads by heavy vehicles. The CoR process has assigned multiple accountabilities for CS Energy and its contractors that extend beyond traditional boundaries of control.

This procedure is divided into 2 key parts -

1. **Responsibilities**
2. **Control Processes.**

4 RESPONSIBILITIES

The responsibilities imposed by CoR are a key requirement. At any time, an employee or contractor may be required to adopt a role that is defined by CoR. More than one role in CoR may be adopted by an individual depending on the activity. For example, a person in control of loading operations would be deemed a "Loader" under CoR. If that same person undertakes packing duties on another occasion they have responsibilities as a "packer" for these activities.

4.1 General Duty

Workers must take reasonable care for their own health and safety and that of others who may be affected by their work when carrying out transport activities. This means:

- Complying with the requirements of CoR and CS Energy health & safety requirements.
- Undertaking risk assessment and controlling hazards to an acceptable level.
- If people activities or work areas are perceived to be at risk, then workers must stop work, make the area safe and report the issue.
- Complying with reasonable directions of CS Energy in order to minimise safety risks arising from transport activities.

4.2 Management and Executives

- Provide and implement systems to manage safety and all requirements and obligations of the Heavy Vehicle National Law.
- Ensure a risk management process is in place to manage Heavy Vehicle National Law requirements.
- Monitor business performance and ensure due diligence and governance regarding CoR requirements.

4.3 Site Senior Manager

- Implement the CoR requirements to ensure that CoR risks are managed to an acceptable level.
- Support periodic due diligence of the CoR systems to provide assurance of system effectiveness.

4.4 Contracting Companies

- Implement systems that comply with CoR requirements or comply with CS Energy systems for CoR.
- Ensure subcontracted companies also comply with CoR requirements. Contractor companies requiring transport of loads must ensure CoR is applied.

4.5 Consignors (those who send freight by road)

CS Energy workers who commission the carriage of a load by road are “consignors” (under the legislation)

- Ensure, so far as is reasonably practicable, that delivery requirements do not require or encourage drivers or contracted carriers to exceed speed limits, regulated work and rest hours or drive whilst impaired by fatigue.
- External consignors must adopt appropriate due diligence to ensure that any subcontracted service is compliant with CoR.
- Work to ensure that loads do not exceed vehicle mass or dimension limits, that loads are secured
- Goods carried on consignor’s behalf are appropriately secured.
- Operators carrying freight containers have a verified Container Weight Declaration.

4.5.1 Vehicle Operators (Drivers)

- Keep full and accurate records as required by National Heavy Vehicle Law.
- Ensure that the vehicle they operate is in roadworthy condition.
- Communicate and intervene to ensure that schedulers comply with their obligations under National Heavy Vehicle Law legislation.
- Use appropriate, serviceable and well-maintained loading and restraining equipment to restrain loads.
- Use suitable vehicles and/or combinations are utilised for all loads.

- Ensure that heavy vehicles and their loads comply with relevant mass and dimension requirements.
- Retain relevant documentation (including a complying Container Weight Declaration if carrying shipping containers) before commencing a journey.
- Obey all road rules including speed.
- Remain fit for work. This includes driving within regulated driving hours, meeting minimum rest requirements, not being impaired by drugs, alcohol or fatigue.

4.5.2 Employers (of Drivers)

- Ensure drivers keep records of driver's activity including work and rest times.
- Ensure that their business practices do not require or encourage drivers to exceed speed limits, exceed regulated driving hours, fail to meet minimum rest requirements or drive while fatigued.
- Heavy vehicles and their loads comply with relevant mass and dimension requirements.
- Competent employees are recruited who understand their National Heavy Vehicle Law responsibilities.
- Relevant National Heavy Vehicle Law training programs are implemented.
- Appropriate, serviceable and well-maintained loading and restraining equipment is provided.
- Suitable and appropriate vehicles and/or combinations are provided.
- Systems to manage safety and all requirements and obligations of the National Heavy Vehicle Law are in place.
- Employers should use best available technology for tracking of vehicles under their control e.g. GPS Vehicle Monitoring Systems.

4.6 Packers

This can include external and internal personnel.

- Goods packed are marked correctly and documentation is accurate, and not false or misleading.
- Goods packed are appropriately secured.
- Goods packed in a freight container do not cause the container's gross weight or safety approval rating to be exceeded.
- Delays in loading packed goods are prevented.

4.7 Loaders

- Check that loads do not exceed vehicle mass or dimension limits.
- Goods carried are appropriately secured and restrained by loader in conjunction with driver.
- Reliable weight information is provided to drivers.
- Load documentation is accurate.
- Loading delays are prevented.

- A risk assessment is applied when loading items onto a truck (Take 2 or JSEA for higher risk).
- Ensure the loading zone is delineated from other workers or work activity.
- Drivers and other personnel are to be confined to safe zones unless they have a defined role and are competent to perform that role (Loading/Unloading Exclusion Zone (LUEZ)).
- Loading activities do not require or encourage drivers to exceed speed limits, exceed regulated driving hours, and fail to meet minimum rest requirements, or drive while fatigued.

4.8 Unloaders

- Unloading delays are minimised as delays may encourage drivers to exceed speed limits, exceed regulated driving hours, fail to meet minimum rest requirements, or drive while fatigued
- Apply risk assessment processes when unloading (Take 2 or JSEA).
- Check if any load unsecured or damaged where it could create a risk when unloading.
- Ensure the unloading zone is delineated from other workers or work activity.
- Drivers and other personnel are to be confined to safe zones unless they have a defined role and are competent to perform that role (Loading/Unloading Exclusion Zone (LUEZ))

4.9 Consignees (Receivers)

- Delivery requirements do not require or encourage drivers to exceed speed limits, exceed regulated driving hours, fail to meet minimum rest requirements, drive while fatigued.
- Operators carrying freight containers have a verified Container Weight Declaration.

4.10 Scheduler

- To ensure that the schedule for the transport of goods does not impose unsafe expectations of drivers or personnel involved in the supply chain in terms of journey time, regulated driving time, breaks, speed, routes etc.
- All necessary scheduling, journey and route information is accessible.
- Transport operators Schedulers are responsible for scheduling driver work and rest hours and work rosters within strict fatigue management requirements. Other than suspending an activity because of a potential risk to health and safety, CS Energy must not alter, direct or seek to influence a Driver's schedule.

5 COR CONTROL PROCESSES

5.1 Management Systems

CS Energy and contractors must implement management systems to control the following in relation to heavy vehicle transport:

- Speed & Fatigue
- Loading Operations
- Security of Loads
- Mass/Dimension of loads
- Vehicle Suitability

5.2 Management of Speed and Fatigue

Drivers of heavy vehicles have an obligation under transport regulations to abide by all road rules including speed and rest breaks.

To minimise any potential for drivers to speed and breach rest breaks CS Energy must encourage all participants in the CoR to schedule and allow for conservative transport times. This includes schedulers adopting conservative travel times, loaders and unloaders undertaking their role in a timely manner.

CS Energy will preference transport operators that use current technology that minimises the potential for speed and fatigue (e.g. GPS Vehicle monitoring systems).

CS Energy requires that drivers clearly articulate their journey which includes previous travel and planned travel to check if it is within fatigue guidelines. Whilst CS Energy may not have the right to prevent a driver from proceeding if there is a concern regarding fatigue, any concern will be reported to a senior manager who may contact local police.

CS Energy will assist drivers to manage future deliveries (eg communications etc) if there was a delay in loading and unloading due to CS Energy.

5.3 Drugs and Alcohol Testing

Drivers may be subject to drug and alcohol testing while on site.

CS Energy will undertake random or post incident drug and alcohol testing of any driver.

Refusal to undertake this testing will result in loading operations halting and reporting of this to a senior manager. As per fatigue above, management reserve the right to call local police if there is a suspicion of the driver being under the influence of drugs or alcohol.

5.4 Loading Operations

The intention of loading operations requirement to ensure that loading is undertaken safely and that vehicle mass/dimension requirements are complied with.

All loading activities at CS Energy sites must be conducted by a competent person.

Truck drivers who self-load must be competent in CoR roles, the use of site-specific equipment and all relevant CSE site procedures.

Loading and Unloading Exclusion Zones (LUEZ) must be established and communicated to ensure drivers and other personnel are not in a zone that presents a risk in relation to crush or fall of load. See *section 9.1*

CS Energy employees involved in the loading and transport process (Consignor) must ensure the following steps are completed for every heavy vehicle loaded on a CS Energy site:

- Before loading can commence, the driver must provide the allowable Gross Vehicle Mass (GVM), Gross Combination Mass (GCM) if applicable, and tare weight for their vehicle.
- The GVM must be confirmed as being within allowable limits. This includes establishing the mass of the vehicle the mass of the product load and adding this to the Tare weight of the vehicle.
- The weights (product plus packaging) of the combined consignment to allow the driver to determine and declare that total gross mass is within legal limits prior to departure. The driver must restrain the load before moving the vehicle.



- All loads must be confirmed by a CS Energy Representative who is competent in TLIF 0001 and completed Load Restraint -Mass, Dimension & Loading training as meeting allowable dimension limits before leaving site.
- For containers loaded with packaged material CS Energy Representatives must refer and complete to HVNL - Container Weight Declaration Information Sheet. TRIM Link - W/D/19/25
- Before leaving a CS Energy site, all drivers with 4.5 tonner GVM vehicles must complete and sign a CS Energy Loading/Unloading Checklist.

5.5 Contract Requirements

CS Energy contracts must include the requirements of CoR.

CoR requirements will be included in contractor HSMS pre-qualification assessments.

Contractors will comply with CoR requirements if transporting goods on behalf of CS Energy

CS Energy will preference transport operators that utilise technologies that limit potential for speed and fatigue such as vehicle monitoring systems.

5.6 Risk Management

Risk Assessment for loading and unloading activities must be undertaken by sites to identify high risk or unusual loads. These loads should be subject to SWI or JSEA.

If SWIs are established for loading and unloading these should be used.

5.7 Site Access

Suitable parking areas for trucks must be provided, so drivers can safely access offices, facilities etc.

Prior to entering site CS Energy must provide a brief site induction with relevant information including LUEZ system.

Regular delivery drivers must undergo full site induction.

5.8 Training and Inductions

All CS Energy workers involved in activities related to heavy vehicle road transport will complete the CS Energy CoR training.

All heavy vehicle road transport drivers, sub-contractors and employees involved in loading and unloading are adequately trained or assessed as competent for their function as per national competency standards.

CoR training needs analysis matrix as follow;

Level 1 – All CS Energy personnel	Demonstrate CoR Awareness Training - LMS
Level 2 – Supervisor, Managers, Planners, Engineers, Contracts / Procurement and Warehouse personnel	Apply chain of responsibility legislation, regulation and procedures TLIF0001
Level 3 – Warehouse Personnel and/or crane operator / dogman / rigger	Introduction to Load Restraint- Mass, Dimension & Loading
Level 4 – CEO, EGM, GM's and Head of Departments	COR Executives briefing

All drivers of heavy vehicles must complete a site induction and maintain currency prior to conducting transport activities at CS Energy sites.

The site induction for drivers will include:

- Relevant site-specific procedures including use of weighbridge/console.
- Working at height.
- Site traffic management plan.
- Site familiarisation.

5.9 Audits & Governance

CS Energy will undertake internal audits and external CoR compliance audits to achieve the Heavy Vehicle National Law.

This will include but not limited to:

- Legal Compliance and Chain of Responsibilities.
- Fatigue Management (Scheduling, Waiting Time, Queuing, Loading & unloading).
- Safe loading preparations, Restraint & Containment, Mass, Container Weight Declarations & Dangerous Goods.
- Speed Management.
- Equipment.
- Driver fatigue management including driver health and fitness for duty
- An assessment of the management of sub contracted freight operations.

6 DEFINITIONS

Term	Definition
Chain of Responsibility (CoR)	The Heavy Vehicle National Law (HVNL) states that every party in the heavy vehicle transport supply chain has a duty to ensure the safety of their transport activities. This widespread duty is called the Chain of Responsibility.
Container Weight Declaration	A container weight declaration is a legal declaration of the weight of a shipping container and its contents. It may be either in hard copy or electronic form, but it must be able to be produced on request by an authorised person.
Gross Combination Mass (GCM)	The maximum loaded weight of the towing vehicle and any trailer, or trailers while travelling on the road.
Gross Vehicle Mass (GVM)	The maximum loaded weight of a rigid vehicle while travelling on the road.
Heavy Vehicle	Any vehicle or vehicle combination above 4.5 tonne GVM (Gross Vehicle Mass).
Heavy Vehicle National Law (HVNL)	The set of laws administered by the National Heavy Vehicle Regulator in relation to vehicles with a GVM of greater than 4.5 tonnes.
Loading / Unloading Exclusion Zone (LUEZ)	An exclusion area set aside for transport / delivery drivers to separate them from mobile equipment movements involved in the unloading / loading activity. See attachment 9.1

Term	Definition
National Heavy Vehicle Regulator (NHVR)	Established as an independent statutory authority pursuant to the Heavy Vehicle National Law, the National Heavy Vehicle Regulator (NHVR) is Australia's independent regulator for all heavy vehicles.
Systems, Applications and Product (SAP)	SAP is a data processing software used at CS Energy to capture incidents within the business.
Tare Weight	The weight of a vehicle when carrying no load.
SWI	Standard Work Instruction for safe execution of the task
Site Senior Manager	Is the Site Manager for Wivenhoe and General Manager for Callide and Kogan Creek Power Station

7 REFERENCES

Reference No	Reference Title	Author
	Work Health and Safety Act 2011	External
	Work Health and Safety Regulation 2011	External
	Heavy Vehicle National Law	External
B/D/19/5901	HSMS Prequalification Checklist	Internal
B/D/18/26036	Loading and Unloading Checklist	Internal

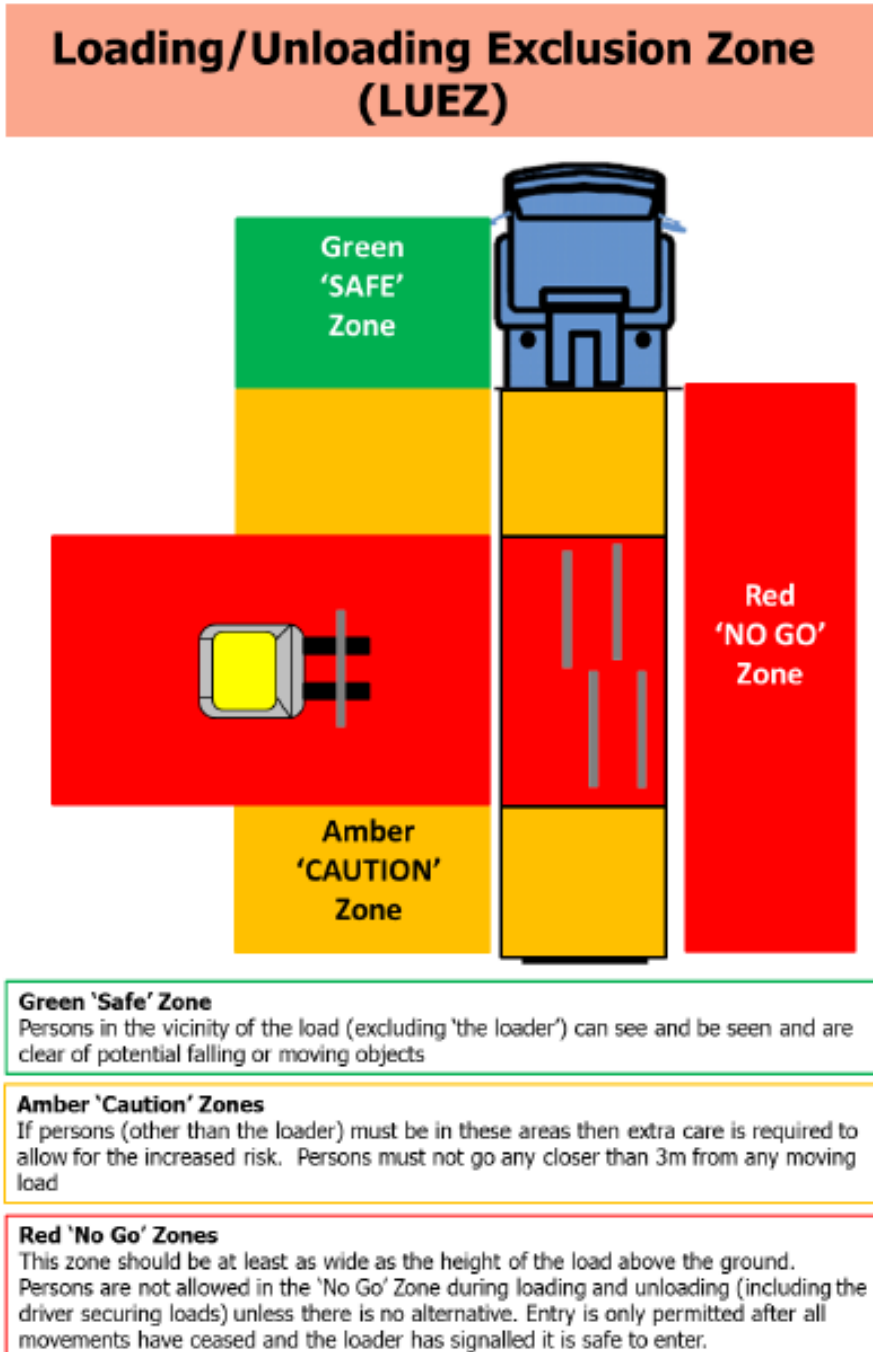
8 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, CS Energy's registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of controlled documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

CS Energy must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to CS Energy business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.

9 ATTACHMENTS

9.1 Attachment 1 – Loading & Unloading Exclusion Zone (LUEZ)



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9.2 Attachment 2 – Responsibility Matrix

	CSE Executive	Site Senior Manager	Contracting Companies	Employers of Drivers	Consignors	Packers	Vehicle Operators	Loader	Unloaders	Consignees	Schedulers	Workers	HS Manager	Procurement	Security
System for CoR	Develop	Implement	Implement	Implement	-	-	-	-	-	-	-	-	Support	-	-
Governance of CoR	Review	Conduct checks	Conduct Checks	Conduct Checks	-	-	-	-	-	-	-	-	Audit	-	-
Contracts Include CoR	-	-	-	-	-	-	-	-	-	-	-	-	-	Yes	-
Schedule to be appropriate	-	-	Yes	Yes	Yes	-	-	-	-	Yes	Yes	-	-	-	-
General Duty	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Training System	Develop	Implement	Implement	Implement	-	-	-	-	-	-	-	-	-	-	Induction
Required Competency	Level 4	Level 4	Level 2& 3	Level 2& 3	Level 2& 3	Level 2	Level 2& 3	Level 2& 3	Level 2& 3	Level 2& 3	Level 2	Awareness	Level 2	Level 2	Level 2& 3
Manage Fatigue & speed	-	-	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	-	-	-	-
FFD check	-	-	Yes	Yes	-	-	Yes	Yes	Yes	Yes	-	-	-	-	Yes
Loading & positioning	-	-	-	-	-	-	Yes	Yes	Yes	Yes	-	-	-	-	-
LUEZ	-	-	-	-	Yes	-	Yes	Yes	Yes	Yes	-	-	-	-	-
Vehicle Roadworthiness & appropriateness	-	-	-	Yes	-	-	Yes	Check	Check	-	-	-	-	-	Check
Mass, Dimension of loads	-	-	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	-	-	-	-