

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: Chief Operating Officer (COO)

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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 primarily 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

Management and workers are responsible for:

- Providing and implementing systems to manage safety and all requirements and obligations of the Heavy Vehicle National Law.
- Ensuring a risk management process is in place to manage Heavy Vehicle National Law requirements.
- Monitoring business performance and ensuring due diligence and governance regarding CoR requirements.

4.3 Site Senior Manager

Site senior managers are responsible for:

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

4.4 Contracting Companies

Contracting companies are responsible for:

- Implementing systems that comply with CoR requirements or comply with CS Energy systems for CoR.
- Ensuring 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) and are responsible for:

- Ensuring, 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.
- Ensuring external consignors adopt appropriate due diligence to ensure that any subcontracted service is compliant with CoR.
- Working 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)

Vehicle operators (drivers) are responsible for:

- Keeping full and accurate records as required by National Heavy Vehicle Law.
- Ensuring that the vehicle they operate is in roadworthy condition.
- Communicating and intervening to ensure that schedulers comply with their obligations under National Heavy Vehicle Law legislation.

- Using appropriate, serviceable and well-maintained loading and restraining equipment to restrain loads.
- Using suitable vehicles and/or combinations are utilised for all loads.
- Ensuring that heavy vehicles and their loads comply with relevant mass and dimension requirements.
- Retaining relevant documentation (including a compliant Container Weight Declaration if carrying shipping containers) before commencing a journey.
- Obeying all road rules including speed.
- Remaining 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)

Employers of drivers are responsible for;

- Ensuring drivers keep records of driver's activity including work and rest times.
- Ensuring 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 complying 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 being 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

Packers are responsible for; (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

Loaders are responsible for;

- Checking 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).
- Ensuring 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

Unloaders are responsible for:

- 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
- Applying risk assessment processes when unloading (Take 2 or JSEA).
- Checking if any load unsecured or damaged where it could create a risk when unloading.
- Ensuring 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)

Consignors are responsible for:

- Ensuring 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

Schedulers are responsible for:

- Ensuring 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.
- 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 CHAIN OF RESPONSIBILITY 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 and 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. The standard work and rest arrangements apply to drivers other than under a BFM accreditation or AFM accreditation. 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 (e.g. 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 and/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.
- Before leaving a CS Energy site, all drivers with 4.5 tonne GVM vehicles must complete and sign a CS Energy Loading/Unloading Checklist.

5.5 Transport of Dangerous Goods by Heavy Vehicles

Refer to CS Energy Hazardous Chemical and Regulated Waste Procedure

5.6 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.

5.7 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.

5.8 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.

5.9 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 must be adequately trained or assessed as competent for their function as per national competency standards.

The CoR training needs analysis matrix is 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 TLIF0009
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 area familiarisation and maintain currency prior to conducting transport activities at CS Energy sites.

5.10 Audits & Governance

CS Energy will undertake audits of CoR to achieve compliance with the Heavy Vehicle National Law.

6 DEFINITIONS

Term	Definition
AFM	Advanced Fatigue Management – rather than setting work and rest hours, AFM offers the flexibility to propose your own hours as long as the fatigue risks of those hours are offset by sleep, rest and other management practices in a compliant fatigue management system.
BFM	Basic Fatigue Management – BFM can operate under more flexible work and rest hours, allowing for (among other thing) work of up to 14 hours in a 24 hour period.
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
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.
CGR	CGR 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 Qld 2012	External
	Heavy Vehicle (Fatigue Management) National Regulation	External
	Heavy Vehicle (General) National Regulation	External
	Heavy Vehicle (Mass, Dimension and Loading) National Regulation	External
	Heavy Vehicle (Vehicle Standards) National Regulation	External
	Heavy Vehicle (Registration) National Regulation	External
	Transport Operations (Road Use Management) Act 1995	External
	Transport Operations (Road Use Management – Road Rules) Regulation 2009	External
	Transport Operations (Road Use Management – Dangerous Goods) Regulation 2018	External
B/D/11/30976	Procedure - CS-OHS-08 - Hazardous Chemicals and Regulated Waste	CS Energy
B/D/14/3971	Form - S2099 - HSMS Prequalification Questionnaire	CS Energy
B/D/18/26036	Form - S2272 - COR - Loading / Unloading Checklist	CS Energy
B/D/18/9134	Form - S2261 (C) – Callide - Site Access Application - Transport Driver to / from Warehouse	Callide
W/D/19/25	HVNL - Container Weight Declaration Information Sheet.	External

8 RECORDS MANAGEMENT

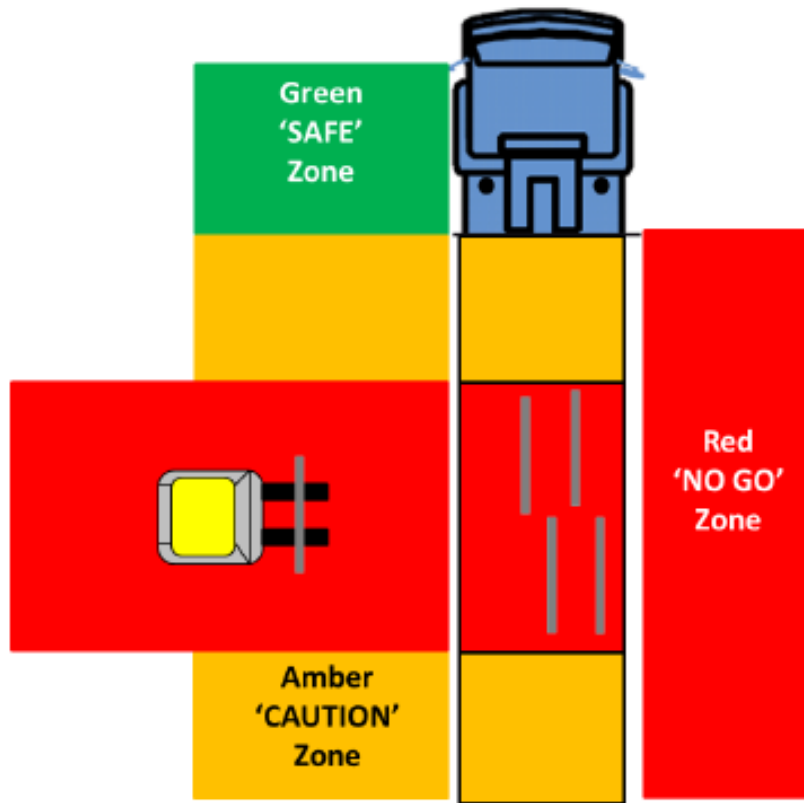
In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of registered documents should occur where it has been identified 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.

Government Owned Corporations 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 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)

Loading/Unloading Exclusion Zone (LUEZ)



Green 'Safe' Zone

Persons in the vicinity of the load (excluding 'the loader') can see and be seen and are clear of potential falling or moving objects

Amber 'Caution' Zones

If persons (other than the loader) must be in these areas then extra care is required to allow for the increased risk. Persons must not go any closer than 3m from any moving load

Red 'No Go' Zones

This zone should be at least as wide as the height of the load above the ground. Persons are not allowed in the 'No Go' Zone during loading and unloading (including the driver securing loads) unless there is no alternative. Entry is only permitted after all movements have ceased and the loader has signalled it is safe to enter.

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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	-	-	-	-