

## CS ENERGY PROCEDURE

# PETROLEUM AND GAS SAFETY MANAGEMENT CS-OHS-02

Responsible Officer: Principal Health and Safety Specialist  
Responsible Manager: Head of Health Safety Security and Environment  
Responsible Executive: Executive General Manager People, Safety and Transformation

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### DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
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For all ongoing reviews, this must contain a short key summary of what has changed. 'Reviewed' or 'Updated' will not be accepted. If a review has occurred and no changes were required, simply add – Reviewed. No changes were required.				
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## 1 PURPOSE

This procedure details the systems, requirements and responsibilities to perform activities involving petroleum and gas plant to ensure safe and effective interaction and maintenance is completed. The procedure is also to maintain knowledge and competencies associated with the safe operation of “operating plant” and activities related to “gas work”.

## 2 SCOPE

This procedure applies to all employees and contractors performing work at CS Energy. It covers all types of work performed by or for CS Energy for the compliance requirements, operation, maintenance, construction, repair, modification, overhauls and design of operating plant, fuel systems, gas systems, gas devices and pipelines.

### 2.1 Petroleum or Gas Devices owned by CS Energy

Gas Pipelines owned by CS Energy
<ul style="list-style-type: none"> <li>Nil</li> </ul>
Type B Gas Appliances owned by CS Energy
<ul style="list-style-type: none"> <li>Callide Power Station – LPG System</li> <li>Kogan Power Station – 45kg Gas Bottle linked to Auxiliary Boiler start up</li> <li>Hydrogen Demonstration Plant</li> </ul>

This safety management plan is in place to permit competent persons to carry out ‘gas work’ on CS Energy’s Type B appliances. Compliance with this plan as well as the specific JSEA / SWMS / Safe operating procedure is required when undertaking ‘gas work’ on site.

## 3 RESPONSIBILITIES AND ACCOUNTABILITIES

Petroleum and Gas Safety Management safety responsibilities are outlined below:

### 3.1 Chief Executive Officer

The Chief Executive Officer is responsible for the business aspects of CS Energy and reports directly to the Board. They have the authority for and is accountable to ensure systems, processes and operating plant are sufficient to ensure the health & safety of all employees at the workplace.

These general obligations are to ensure that:

- Standard operating procedures, emergency response procedures and any other information is available for the safe operation of the plant;
- All necessary first aid, safety and other like equipment that is appropriate for the likely hazards of the plant is provided;
- Everyone working at site on petrol, gas or hydrogen operating plant is trained to use equipment relevant to their duties and performs these duties and responsibilities in accordance with the safety management plan for the plant;
- Training records are kept as soon as practicable after the training happens;
- Training records in relation to the plant are kept at the plant for a period of 5 years after the training was completed and are available to an inspector; and
- An annual safety report is lodged with the Petroleum and Gas Inspectorate.

### 3.2 Executive General Manager Operations

The Executive General Manager Operations is responsible for the operations associated with CS Energy sites and reports to the Chief Executive. They have authority for and are accountable to approve activities, budgets, business plans, resources and procedures utilised at CS Energy power stations.

The Executive General Manager Operations must ensure:

- Health & safety management systems are developed, implemented and maintained;
- Risk management plans are developed for major risks throughout the organisation;
- Any high-risk incidents are reported, investigated and control measures implemented;
- Training is conducted for operators and workers on the safety systems developed and records are maintained;
- Competent persons are engaged to implement procedures and operate plant; and
- Information and advice is provided to the Chief Executive on health and safety issues.

### 3.3 Site General Managers

Site General Managers are responsible for the site management aspects of operational plant and report to the Executive General Manager Operations. They have authority for and are accountable to ensure systems, process and operating plant are utilised to ensure the health & safety of all employees at the site and power station workplace.

As "site safety manager" these obligations are to ensure that:

- Each person who enters the site to perform work is given an appropriate induction to ensure compliance;
- Each person on site complies with the procedures, emergency response procedures and other measures necessary for the safety of the site and persons;
- Each person working on site performs their functions safely and follows procedures for the plant;
- First aid, safety and other like equipment appropriate for the likely hazards of site is available for use and adequately maintained;
- Site personnel as trained in first aid, emergency and safety procedures;
- Operators of the plant have the necessary competencies to maintain gas works authorisation/license.

The Acting Site General Manager and Senior Shift Operator/Shift Coordinator are to institute these obligations and responsibilities on shift where the Site General Manager is not on site.

### 3.4 Engineers and Consultants

Site engineers and consultants are responsible for the design and operational issues associated with petroleum and gas plant. They have authority for and is accountable to ensure:

- The design, procurement, modification, repair or replacement of plant or equipment meets the specifications and safety requirements applicable to that type of plant or equipment; and
- All reasonable steps are taken to ensure the plant or equipment meets relevant Codes, Regulations and Australian Standards, addresses the level of risk associated with the plant to an acceptable level.

If they become aware of a defect or hazard associated with the plant or equipment take reasonable steps to inform the Site General Manager of the nature of the defect or hazard and its significance, and any controls or modifications developed to eliminate or correct the defect or hazard.

### 3.5 Installation/Commissioning/Operators/Overhaul Contractors

CS Energy workers and/or contractors and their employees must not install, operate, modify, overhaul or commission operating plant or equipment at any CS Energy site unless the installation:

- Complies with the specification and risk analysis levels identified for the operating plant or equipment by the designer;
- A risk management analysis is conducted to manage the risk to an acceptable level and is within the safety limits of the plant or equipment for the stage of work (installation, commissioning, operation and overhaul); and
- The risks associated with modifications, maintenance, repair and replacement do not increase overall risk level of the plant, process, work procedures associated with the work; and
- Certify the plant or equipment meets safety requirements prior to making the plant operational.
- Notify CS Energy Site Management of any safety risk they become aware of, and not operate the plant or equipment until the risk is addressed.

### 3.6 Head of Health and Safety, and Site Specialists

The Head of Health and Safety and Site Health & Safety Specialists are responsible for:

- Providing advice and recommendations on appropriate inductions, safe work procedures, training and record keeping requirements associated with this procedure;
- Ensuring suitable equipment for first aid and emergency equipment is used and checked;
- The site and corporate systems are implemented, reviewed and amended to comply with the Petroleum and Gas (Production and Safety) Act, Regulation, Codes and Australian Standards;
- Control access to an incident or accident and prevent tampering with the site, plant or equipment involved;
- Maintain a copy of the safety management plan and make it available for review and inspection;
- Report and defects, hazards or competency issues to the Site General Manager; and
- Record and review any non-conformance and subsequent corrective actions, remedies to the operating plant equipment or safe work procedures.

### 3.7 Supervisors, Workers and Others

Each person at a CS Energy workplace must (to the extent of their duties and responsibilities):

- Take all necessary and reasonable action to ensure no person or property at the workplace is exposed to more than an acceptable level of risk.
- Comply with the safety procedures and other obligations under this safety management plan
- Operate, maintain, inspect, commission, design, install, modify and overhaul the plant and equipment to an acceptable level or risk in the manner it was designed.
- Comply with instructions given by CS Energy representatives or their supervisor for the safety and health of persons or for the safe use of the plant or equipment.
- Not wilfully or recklessly do any act or make any omission that adversely affects the safety of any one or the safe use of the operating plant.
- Immediately report any hazards, incidents, environmental factors or inactions, to their supervisor and/or to CS Energy site management that may adversely affect safety on site.

## 4 GAS SAFETY COMPLIANCE ACTIONS

No.	Item	Due Date
1	Maintain test records of the water deluge system over LPG tanks and provide a work procedure for the manual operation of the system. Completed by Plant owner/Asset area.	Maintain each year
2	Maintain documentation to verify that relevant employees have the appropriate qualifications to carry out work on the gas system. Refresher training should be completed every 2-3 years. Completed by Site Training Support – LMS training records.	Maintain each year
3	Provide documentation to verify the qualifications of contract gas fitters that are carrying out the work on the gas system. Records held against relevant contract – TRIM contract records.	Maintain and update every 3 year or upon contract renewal.
4	Site instrument technicians working on the gas system are to be formally trained in gas servicing. Type B Gas Course (CPCPGS4023A) Training supplier: External Provider. Completed and maintained by Site Instrument Technicians.	Refresher training should be completed every 2-3 years.
5	Ensure all operating procedures relating to gas system are reviewed and approved by Senior Management. The document is to clearly define the interaction between CS Energy and Contractors performing gas work. This must include reference to persons in control of work, safe work procedures, risk assessments and emergency response. Completed by Plant owner/Asset area and Site General Manager.	Review 2 Yearly
6	Ensure all safe work procedures (JSEA/SWMS/operating procedures) have all work steps included, all hazards are identified and controls are documented. Records held against relevant project/contract – TRIM contract no.	Maintain each year
7	CS Energy must engage a competent person to check the entire gas system for compliance with Australian Standard 3814. Audit report to address required actions. Audit Supplier: External Provider Completed by Plant owner/Asset area and Site Health and Safety	As required
8	CS Energy must ensure the Site General Manager is formally appointed and has received training in their obligation under the P&G Act. CEO and Executive are to be familiarised of their obligation under the P&G Act. Completed by Site Health and Safety Team	Training completed every 2-3 years or when new Site General Manager appointed.
9	The CS-OHS-02 Petroleum and Gas Safety Management procedure is to be reviewed on an as needs basis when conditions or requirements change (e.g. legislative update or plant change). Completed by Brisbane Health and Safety Team	As required or every 2 years to review currency

## 5 HEALTH & SAFETY MANAGEMENT SYSTEM

CS Energy operates a health & safety management system, which is based on minimising the risk of causing harm to all people at our sites. It is focussed on:

- Compliance to legislative requirements as below; and
- Risk management – requirement to provide a safe workplace.

Relevant Legislation
QLD Workplace Health and Safety Act
QLD Workplace Health and Safety Regulation
Petroleum and Gas (Production and Safety) Act
Petroleum and Gas (Production and Safety) Regulation
Electrical Safety Act



Relevant Legislation
Electrical Safety Regulation
AS 2885 – Pipelines, Gas and Liquid Petroleum
AS3814 – Industrial and Commercial Gas-fired Appliances
Hydrogen Safety Code of Practice

## 6 RISK MANAGEMENT PROCESS

CS Energy risk management process aligns with AS/NZS 4360 – Risk Management to manage risk across the organisation. This procedure deals specifically with the operational and production safety risk management and change management processes. It aims at controlling hazards to an acceptable level or developing appropriate control strategies and measures to minimise the level of risk. Risks shall be managed using the hierarchy of control.

CS Energy uses the Enterprise Risk Management (ERM) system to review and manage high-level plant, operational and people risks that have the potential to impact business objectives. Health and safety risks critical to business continuity are managed within the Insight system.

As a subset of the ERM, each site shall maintain a risk register detailing the health and safety hazards of low, moderate and significant risk rating and their corresponding risk mitigation measures (controls).

It is expected that a JSEA or equivalent is in place when interacting with Type B gas appliances on site. This risk assessment is to detail control measures to ensure the job is completed safely.

### 6.1 Contractor Risk Management

CS Energy may use external contractors to perform specialised activities and maintenance on site. It is a requirement for the contractors to comply with all CS Energy safety systems (e.g. PTW system) and implement a risk management system that is equal to or better than CS Energy's process.

Tendering, selection, mobilisation, job executing and review of the contractors are completed using [CS-OHS-67 Contractor Quick Guide](#) or [Procedure CS-CMP-00 - Contractor Management B/D/13/34521](#).

The primary aim is to ensure the contractor has provided planning/risk management documentation, a CS Energy contact is identified, and expectations clearly explained, agreed and implemented before any work commences. A safety management plan, safe work method statements or other risk assessments may be submitted for CS Energy approval prior to awarding and commencing the work.

Ongoing review through workplace inspections, safety interactions and critical control audits both from the contractor and CS Energy will determine short falls in work process or control in place.

### 6.2 Safe Operating Procedures

Site operating procedures/manual for gas operating plant and fuel/petroleum systems are to support this procedure and be utilised in plant operator training systems and procedures. Specific job safety and environment analysis procedures (JSEAs) are to be developed for any maintenance, inspection and isolation work on petroleum and gas installations.

Asset owners are to ensure all operating procedures relating to the petroleum and gas installations are reviewed and approved by Senior Management. The document is to clearly define the interaction between CS Energy and Contractors performing gas work. This must include reference to persons in control of work, PTW systems, safe work procedures, risk assessments and emergency response.

## 7 PERMIT TO WORK

CS Energy will manage all permitting for power station and gas pipeline activities using the Permit to Work (PTW) Process. The PTW process ensures the positive and effective isolation of energy sources. It aims to ensure that work occurs with the appropriate level of safety to reduce exposure to risk in a systematic, planned and approved manner by providing a mechanism for employees, contractors and/or

other relevant third parties to identify, schedule, evaluate and review works before proceeding with the activity. All employees will be trained in the PTW process during the induction process and additional training is provided on an ongoing basis.

The PTW Process must be followed under all circumstances. Refer to [CS-PTW-01](#) Permit to Work, for details of this process. All control measures, isolations and subsidiary work permits under the PTW must be implemented before work commences.

The PTW process requires permits for the following activities:

- Accessing operational plant (including type B gas appliances)
- Electrical and mechanical isolations
- Hot work
- Working at heights
- Confined spaces
- Excavation and digging
- Live electrical work
- Radiation
- High voltage equipment
- Specified hazardous areas

## 8 TRAINING, COMPETENCY AND AUTHORISATION

Training modules are to be compliant to national competency Type B Gas Course (CPCPGS4023,) which addresses gas awareness, gas operations, and appliance/operating plant. This training is to be conducted by recognised (RTO) petroleum and gas industry training consultant/s and include site-specific competencies.

A gas work authorisation (industrial appliances) authorises the holder, or a person acting under the holder's authority, to carry out gas work in relation to an industrial appliance, group of appliances or gas system, as stated in the authorisation. The Petroleum and Gas (Safety) Regulation 2018 prescribes the requirements for each type of gas work authorisation.

Additionally, access to work on plant is to be restricted by authorisations issued by the Site General Manager based on the competency of the workers involved. The authorisation is to relate to:

- The requirements of the CS Energy PTW system
- Observation or regular testing of persons conducting work;
- Isolation and or operation of plant; and
- Work on gas systems, repair and or replacement of like for like components.

Managers, superintendents and supervisors/team leaders are responsible for monitoring the ongoing competence of their staff and are to make arrangements for retraining as necessary. Currency of statutory training is to be managed using the site LMS training database. Save training correspondence in TRIM.

## 9 PLANT INSTALLATION, MODIFICATION AND MAINTENANCE

Any plant installation, changes or improvements to plant and equipment are completed using CS Energy's Plant Modification process – [CS-AM-010](#). The [S1997](#) Plant Modification Quality Plan and Check Sheet are completed to document quality assurance steps undertaken for plant improvement.



Plant maintenance is executed using (proactive) planned/scheduled maintenance protocols or (reactive) break-in/priority maintenance. Each site has equipment installed that impacts the safety of the gas installations. These items of equipment and supporting systems include:

- Gas detectors;
- Earthing systems;
- Fuel gas sampling and monitoring controls;
- ICMS; and
- Emergency fire and evacuation systems.

Maintenance and inspection schedules are to ensure these items are effectively maintained.

Actions, milestones and approvals are outlined in the specific project/risk plans or improvements requests. Capital Expenditure may require government approval over certain thresholds. Maintenance undertaken to address identified plant risks are updated and reported using the Enterprise Risk Management system (ERM) and reported to management.

Permission to access to plant is managed via the CS Energy permit to work system where energy sources are identified, isolated, tagged and locked out.

## 10 CONTROL SYSTEMS (ICMS)

CS Energy Power Station sites have in place, established plant control systems (often referred to as the ICMS – Integrated Control and Monitoring Systems). These control systems are designed, implemented and maintained to provide plant safety. They are programmable systems with duplication of key components to provide fault tolerance.

The Plant Control System provides:

- Automated fail-safe controls for plant protection. Gas valves and gas fuel control systems are fail-safe;
- Fuel gas pressure and temperature controls;
- Boiler temperature and pressure control;
- Gas Turbine temperature and fuel control;
- Chemical sampling and analysis system for the monitoring and control of water (for some sites this is automatic, as part of the Plant Control System, for some sites it is manual);
- Condition (vibration) monitoring for petroleum and gas plant assets (alarm and trip);
- Plant operation and status reporting for the plant operators;
- Alarm systems with alarms prioritised;
- Automatic gas leak detection, including gas leak detectors over potential leak sources; and
- A separate fire protection system (controls and alarms) is provided independent of the plant control system.

## 11 EMERGENCY MANAGEMENT

CS Energy has emergency systems installed to address the risks associated with fires, gas leaks, chemical leaks, environment and security threats.

Equipment utilised to support plant systems include:

- Fire hose reels and fire extinguishers located in strategic positions, hazmat boxes and site hazardous substances;
- Foam fire extinguisher systems;

- First aid rooms and equipment;
- Emergency evacuation and lighting systems;
- Emergency response team – fire-fighting, ropes rescue, chemical management, confined space rescue and advanced first aid capabilities;
- Relationships with local emergency services and rescue/recovery providers;
- Security fences, security gates, card access readers and security cameras;
- Communication equipment (2-way radio, satellite phone, communication plan); and
- Crisis management teams and site incident response team.

Sites are to ensure plant and equipment for emergency response are effectively maintained and resources are allocated to maintain currency for ERT members and Security providers.

## **12 INCIDENT MANAGEMENT**

All incidents, which includes injuries, near misses, dangerous occurrences and issues of non-compliance with health and safety procedures that occur across the business must be reported to your supervisor.

Superintendents, coordinators or supervisors shall enter incidents directly into the incident management database and shall be managed as outlined in [CS-IM-01](#) Learning from Incidents.

“Prescribed Incidents” specified in Petroleum and Gas (Production and Safety) Regulation will be reported and recorded in accordance with CS Energy’s Learning from Incidents procedure. Prescribed incidents under the Petroleum and Gas (Production and Safety) Regulation are to be reported to Department of Natural Resources and Mines.

## **13 DOCUMENT CONTROL / LIBRARY MANAGEMENT**

Sites document control and library management processes are to address:

- Design change / modifications procedures and AFC drawings, product specifications;
- Contract documentation is to be in accordance with the procurement standard contracts;
- ERM documentation is addressed in the Risk Management procedure;
- Certification, authorisations, approvals are filed in TRIM;
- Plant strategies, O&M Manuals, Manufacturers information, training manuals;
- Training records are filed in individual TRIM training folders and recorded in the SAP Training by People and Culture;
- P&ID, plant drawings, KKS numbering systems are documented in the site systems; and
- Work orders and isolation sheets are recorded in SAP
- Inspection records and audit reports are saved in TRIM.

## 14 DEFINITIONS

Term	Definition
<b>Audit</b>	A systematic examination against defined criteria to determine whether activities conform to planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve the organisation's policy and objectives.
<b>Permit to Work</b>	A work control document which assists in work being carried out safely.
<b>AS2885</b>	<p>Australian Standard – Pipelines – Gas and Liquid Petroleum has the objective of providing the requirements for the design, construction and operation of steel pipelines and associated piping and components used to transmit single and multiphase hydrocarbon liquids.</p> <p>It currently has five parts four of which specifically relate to CS Energy Assets:</p> <ul style="list-style-type: none"> <li>• Design and construction</li> <li>• Welding</li> <li>• Operation and maintenance</li> <li>• Field pressure testing</li> </ul>
<b>Competent Persons</b>	A person who has acquired through training, qualification, experience, or a combination of these, the knowledge and skills qualifying that person to perform a task.
<b>Dangerous Event</b>	<p>An event caused by specified high risk plant;</p> <p>An event at a workplace caused by workplace activity; and</p> <p>If the event involves or could have involved exposure of persons to risk their health and safety because of:</p> <ul style="list-style-type: none"> <li>• Collapse, overturning, failure or malfunction of, or damage to, an item of specified high risk plant;</li> <li>• Collapse, or failure of an excavation or of any shoring supporting an excavation;</li> <li>• Damage to any load bearing member of, or the failure of any brake, steering device or other control device of, a crane, hoist, conveyor, lift or escalator;</li> <li>• Implosion, explosion or fire;</li> <li>• Escape, spillage or leakage of any hazardous material or dangerous goods;</li> <li>• Fall or release from a height of any plant, substance or object;</li> <li>• Damage to a boiler, pressure vessel or refrigeration plant; and</li> <li>• Uncontrolled explosion, fire or escape of gas or steam.</li> </ul>
<b>Dangerous Situation</b>	A situation relating to petroleum or fuel gas in which an inspector reasonably believes an imminent risk of material harm to persons or property is likely if action is not taken to avoid, eliminate or minimise the risk.
<b>Dangerous Electrical Event</b>	<p>Section 12 of the Electrical Safety Act 2002 defines a dangerous electrical incident as including:</p> <ul style="list-style-type: none"> <li>• Events involving electrical equipment and in which electricity causes significant property damage;</li> <li>• Unlicensed or unauthorised electrical work;</li> <li>• Unsafe electrical work or unmarked electrical equipment is found; and</li> </ul> <p>Other incidents involving high voltage where a person does not receive a shock or injury but the person was not electrically safe, or had they been present they would not have been electrically safe.</p>
<b>Executive Officer</b>	Executive Officer of a corporation, means a person who is concerned with, or take part in, its management, whether or not the person is a director or the person's position is given the name of executive officer.
<b>Gas Device (Type A)</b>	Gas Device (Type A) is a device, or system or devices, used, or designed or intended for use for the production of heat, light or power, the design of which has been certified as complying with safety requirements applying to that type of device.
<b>Gas Device (Type B)</b>	Gas Device (Type B) is a device used, or designed or intended for use in the production of heat, light or power that has not been certified.
<b>Incident</b>	An unplanned event resulting in, or having a potential for injury, ill health, damage or other loss.

Term	Definition
<b>Job Safety &amp; Environmental Analysis</b>	A document derived from systematic evaluation of a work activity that identifies potential hazards and their controls. JSEAs incorporate a review of the site conditions. The associated safety, environmental and stakeholder hazards are identified, risk assessed, and controls specified to reduce the risks to as low as reasonably practicable.
<b>Plant</b>	Any facility, equipment connected or otherwise that is related to the transport of high pressure gas from receipt point to delivery point.
<b>Risk Assessment</b>	Overall process of estimating the magnitude of risk and subsequently deciding what actions will be taken to reduce the risk to ALARP.
<b>Standard Operating Procedure</b>	A document that details how to successfully complete a work activity. SOPs highlight areas of risk and incorporate strategies to reduce those risks. All elevated risk; routine work shall have an associated SOP.

## 15 REFERENCES

Reference No	Reference Title	Author
	Petroleum and Gas (Production and Safety) Act	
	Petroleum and Gas (Production and Safety) Regulation	
	Electrical Safety Act	
	Electrical Safety Regulation	
	Hydrogen Safety Code of Practice	
	QLD Workplace Health and Safety Act	Qld Govt
	QLD Workplace Health and Safety Regulation	Qld Govt
	Queensland Gas Work Authorisation Requirements	
AS 3814	Industrial and Commercial Gas-fired Appliances	Standards Aust
AS 2885	Pipelines – Gas and Liquid Petroleum	Standards Aust
<a href="#">B/D/13/5046</a>	Specification - MECH - CS-AM-009 - Plant identification Standard	CS Energy
<a href="#">B/D/10/7377</a>	Procedure - CS-AM-010 - Plant Modification	CS Energy
<a href="#">B/D/13/34521</a>	Procedure - CS-CMP-00 - Contractor Management	CS Energy
<a href="#">B/D/11/45318</a>	Procedure - CS-IM-01 - Learning from Incidents	CS Energy
<a href="#">B/D/11/43851</a>	Compliance Plan - CS-IM-02 - Crisis Management	CS Energy
<a href="#">B/D/11/19582</a>	Procedure - CS-PTW-01 - Permit to Work (PTW)	CS Energy

## 16 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.