



stanwell

# BUSINESS PROCEDURE

## Principal Contractor HSE Requirements HSE-PROC-18



***This document applies to:***

All Sites



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## 1.0 Purpose/Scope

This Business Procedure describes the minimum Health, Safety and Environment (HSE) requirements for a Principal Contractor (PC) engaged by Stanwell Corporation Limited (Stanwell) for a Construction Project.

This Business Procedure applies to all PCs appointed by Stanwell under the Work Health and Safety (WHS) legislation. The Business Procedure must be used by Principal Contractors to support the contractual arrangements to meet Stanwell's HSE requirements.

## 2.0 Legislative Requirements

The PC must comply with duties as a PC under the *QLD Work Health and Safety Regulation 2011*, which include but are not limited to:

- installation of signage identifying the PC;
- preparation of a Workplace Health and Safety (WHS) Management Plan, before work on the project commences;
- informing all persons of the WHS Management Plan before they commence;
- reviewing the WHS Management Plan and ensuring that each person carrying out construction work is made aware of any revision;
- obtaining copies of Safe Work Method Statements (SWMS) relating to high-risk construction work before the high-risk construction work commences;
- implementing arrangements for ensuring compliance with specified requirements such as facilities and amenities; and
- managing risks associated with construction materials and waste, plant, traffic, and essential services.

The PC must also comply with environmental legislative requirements, as outlined within Section 16 of this Business Procedure.

## 3.0 Project HSE Management Plans

### 3.1 HSE Management System

The PC must have, or must develop, a robust HSE management system which complies with the HSE legislation and aligns with *AS/NZS ISO 45001:2018 Occupational Health and Safety Management Systems* and *AS/NZS ISO 14001:2016 Environmental Management Systems*.

### 3.2 WHS Management Plan

The PC must develop and provide a WHS Management Plan for the project that complies with the *Qld Work Health and Safety Regulation 2011* and demonstrates how the PC will manage project specific health and safety risks.

In developing the WHS Management Plan, the PC must consider the requirements of:

- Acts and Regulations relevant to the scope of work;
- codes of practice, guides, and Australian Standards relevant to the scope of work;
- contractual requirements outlined in the Contract with Stanwell; and
- other requirements outlined within this Business Procedure.

The WHS Management Plan must refer to other related topic specific management plans, such as Traffic Management, Emergency Management, Interface Management, etc.

### 3.3 Environmental Management Plan

The PC must develop and provide a project specific Construction Environmental Management Plan (CEMP) (or combined HSE Management Plan) based on the requirements of the scope of work, inherent environmental risks and other requirements outlined within this Business Procedure.

In developing the CEMP, the PC must consider the requirements of:

- Acts and Regulations relevant to the scope of work;
- codes, policies, guidelines, and Australian Standards relevant to the scope of work;
- environmental approval obligations (i.e. Environmental Authorities, Species Management Programs, Permits);
- contractual requirements outlined in the Contract with Stanwell; and
- other requirements outlined within this Business Procedure.

The CEMP must refer to other related aspect specific sub-management plans, such as Erosion and Sediment Control, Water Quality Management, Air Quality Management, Noise and Vibration Management, Biosecurity and Weed Management, Waste Management, etc.

### 3.4 Management Plan Review

The PC Management Plans and supporting documentation must be submitted to Stanwell for review prior to mobilisation to site.

The PC must also review and revise the Management Plans to ensure that they remain up to date throughout the project. The PC must ensure that each person carrying out construction work in connection with the project is made aware of any revision to the Management Plans.

## 4.0 Site Mobilisation

Prior to mobilisation to site the PC must provide all required HSE documentation as required by the Contract, Scope of Work, this Business Procedure and as outlined within the *Stanwell Mobilisation Readiness Checklist (T-3913)*.

The PC must also participate in a 'Project Kick Off Meeting' which must include health, safety and environment as an agenda item.

Following receipt and review of mobilisation deliverables from the PC, Stanwell will issue a *Notice giving Possession of Site (CM 15/72971)* for the Project Site/ Licenced Construction Area (LCA).

## 5.0 Risk Management

### 5.1 Risk Appetite

In undertaking the project, the PC should consider Stanwell's risk appetite for HSE risks as per the *Stanwell Risk Appetite Statement (GOV-POL-38)*, this includes:

Risk Category	Sub-Risk Category	Risk Appetite Statement
Health & Safety	Health & Safety Management	Stanwell cares for the health, safety and wellbeing of its people. Stanwell has no appetite for events / circumstances that cause serious injury or fatality, or serious negative impact to the health and wellbeing of our people.
	Regulatory Compliance	Stanwell is committed to complying with applicable health and safety regulatory requirements. Stanwell <b>has no appetite</b> for incidences of: <ul style="list-style-type: none"> <li>• material breaches of health and safety regulations;</li> <li>• repeat breaches of health and safety regulations; or</li> <li>• intentional breaches of health and safety regulations, or Stanwell’s policies or practices.</li> </ul>
Environmental	Neighbour Impact	Stanwell has a <b>conservative appetite</b> for managing our asset’s impacts on neighbours; we comply with Environmental Authority conditions, and wherever possible, avoid negatively impacting neighbours, while ensuring any commercial cost is reasonable.
	Environmental Management	Stanwell is committed to managing environmental risks and complying with legal and other relevant environmental requirements. Stanwell has <b>no appetite</b> for incidences of: <ul style="list-style-type: none"> <li>• material breaches of environmental regulations or environmental authority conditions;</li> <li>• repeat breaches of environmental regulations or environmental authority conditions (except those related to administrative or sampling errors with no environmental harm, have no impact to risk profile and are not seen as significant by the regulating authority); or</li> <li>• intentional breaches of environmental regulations or environmental authority conditions.</li> </ul>
	Rehabilitation	Stanwell has <b>no appetite</b> for not completing effective rehabilitation activities in a timely manner.

## 5.2 General Risk Management Requirements

The PC must develop and implement risk management processes to identify project specific HSE hazards, assess risks and control and communicate those risks and control measures.

The PC must eliminate HSE risks so far as is reasonably practicable, and if not reasonably practicable to eliminate HSE risks, utilise the hierarchy of controls to minimise those risks so far as is reasonably practicable.

Risks must be assessed using a risk assessment matrix that includes likelihood and consequence criteria. The risk assessment matrix must be provided to Stanwell for review prior to risk assessments being conducted.

## 5.3 Risk Register

The PC must undertake a Project HSE Risk Assessment and maintain a Project HSE Risk Register (Risk Register). The Risk Register must be provided to Stanwell prior to the commencement of construction.

The Risk Register must identify all HSE risks associated with the works and identify mitigations in place to eliminate or reduce risks through the application of the hierarchy of controls.

The Risk Register must be maintained and regularly reviewed, by the PC to ensure that it remains current until such time that the project has been handed over successfully. The PC must provide Stanwell with records of any changes to the Risk Register, as soon as practicable.

## 5.4 Risk Assessment

The PC must ensure that risk assessments are prepared for activities undertaken on site. The PC must determine the most appropriate risk assessment tool, depending on the nature of the works, in accordance with their risk management procedures.

Safe Work Method Statements (SWMS) must be prepared for high-risk construction work activities in accordance with the *Qld Work Health and Safety Regulation 2011*. The PC must establish and include within the WHS Management Plan, arrangements for the collection and any assessment, monitoring, and review of SWMS.

## 5.5 Permit to Work

The PC must establish and implement adequate work procedures and processes relevant to the project scope of work.

The PC should identify and consider relevant work activities that require a permit, such as:

- hot work;
- electrical work;
- isolations;
- confined space work;
- work at height;
- demolition;
- asbestos removal;
- excavation / land and vegetation disturbance work; and
- diving operations.

The PC must provide a copy of their permit to work procedures to Stanwell before undertaking any relevant work activities.

## 5.6 Electrical Safety

The PC must ensure risks associated with electrical installations and work are identified and managed. Processes must be developed in accordance with relevant legislation, including but not limited to:

- *Qld Electrical Safety Act 2002;*
- *Qld Electrical Safety Regulation 2013;*
- *Qld Managing Electrical Risks in the Workplace Code of Practice 2021;*
- *Qld Electrical Safety Code of Practice 2020 – Works;*
- *Qld Working Near Overhead and Underground Electric Lines Code of Practice 2020; and*
- *AS/NZS 3012:2019 Electrical Installations – Construction and Demolition Sites.*

## 5.7 Safety in Design

The PC must implement Safety in Design processes and integrate control measures early in the design process to eliminate or, if this is not reasonably practicable, minimise risks to health, safety and the environment.

When designing structures, the PC must undertake Safety in Design activities in accordance with the *Qld Work Health and Safety Regulation 2011* and *Qld Safe Design of Structures Code of Practice 2021*.

The PC must also consider the requirements of the environmental legislation, including but not limited to:

- *Qld Environmental Protection Act 1994;*
- *Qld Environmental Protection Regulation 2019;*
- *Qld Environmental Protection (Air) Policy 2019;*
- *Qld Environmental Protection (Noise) Policy 2019;*
- *Qld Environmental Protection (Water and Wetland Biodiversity) Policy 2019; and*
- Environmental Authority, where applicable.

Risk workshops including Safety in Design (SiD), Hazard identification (HAZID) and Hazard and Operability (HAZOP) must be undertaken, with consideration to the following requirements:

- facilitation by appropriately qualified and experienced professionals;
- attendance by relevant personnel, including but not limited to, designers, engineers, construction workers, health and safety and environmental professionals;
- invitations for attendance extended to representatives from Stanwell; and
- provision of supporting documentation for review prior to the workshop.

The PC must provide written Safety in Design reports to Stanwell that specify the hazards relating to the design.

## 6.0 Leadership and Commitment

The PC should demonstrate effective leadership and commitment to managing HSE for the project. The PC's leadership team management must:

- take overall responsibility and accountability for the prevention of work-related injury and ill health;
- ensure a HSE Policy and related HSE objectives and targets are established and are compatible with the project;

- ensure the integration of the PC's HSE management system requirements into the project's processes;
- ensure adequate HSE resources (including people, facilities, and equipment) are provided and available in accordance with the Contract;
- ensure and promote continual HSE improvement;
- support reporting of incidents, hazards, risks, and opportunities; and
- establish and implement processes for consultation and participation of workers.

The PC should consider establishing a Field Leadership Program to improve HSE outcomes through visible and engaged leaders. The Field Leadership Program should be designed primarily for leaders with operational accountabilities to engage with their teams on HSE in the field through activities, such as:

- HSE observations / interactions;
- critical control verifications; and
- inspections / audits.

The Field Leadership Program is to be documented within the WHS Management Plan, or another readily available document.

## 7.0 Induction, Training and Competency

### 7.1 Induction

The PC must establish and implement an induction program which provides information about the HSE risks and work practices specific to the project, some items to consider include:

- hazards and control measures relevant to the site;
- project specific HSE documents, policies, and plans;
- supervisory, consultation, issue resolution and reporting arrangements;
- site HSE rules;
- workplace facilities, including their location, use and maintenance;
- first aid provisions and emergency procedures, including after-hours emergency contacts;
- health monitoring requirements and procedures;
- location of underground / overhead services; and
- access, egress and security.

Relevant content relating to Stanwell specific requirements must be included in the PC Induction.

The PC may also be required to participate in Stanwell induction processes. This may include participation in online and/or face to face training. These requirements are to be confirmed and agreed prior to mobilisation.

The PC must also ensure that any person who is to carry out construction work has completed General Construction Induction Training in accordance with the *Old Work Health and Safety Regulation 2011*.

### 7.2 Training and Competency

The PC must establish and implement training and competency processes for the project, including but not limited to:

- undertake a Training Needs Analysis and determine the required HSE training and competency requirements for personnel undertaking work on the project;
- provide training as required by applicable laws and standards;

- ensure that all workers hold and have proof of a high-risk work licence or competency applicable to the work being undertaken out on site;
- develop and implement a Verification of Competency (VOC) process (or similar) for high-risk work licences and mobile plant operation; and
- maintain a Training Register (or similar) of training and competency qualifications for project personnel.

## 8.0 Subcontractor Management

The PC must establish processes for the management of subcontractors working on the project. This should include consideration to selection, onboarding / induction, monitoring arrangements and actions that will be implemented if the subcontractor is not complying with legislative requirements or the requirements of the HSE Management Plan.

Depending on the locality of the project, subcontractors may also be required to participate in Stanwell Induction processes. This may include participation in online and/or face to face training. These requirements are to be confirmed and agreed prior to mobilisation.

The PC must document subcontractor management processes within the WHS Management Plan for the project.

## 9.0 Communication and Consultation

### 9.1 Consultation, Cooperation and Coordination

The PC must develop and implement consultation, cooperation, and coordination processes that comply with consultation requirements under the *Qld Work Health and Safety Act 2011*, *Qld Work Health and Safety Act 2011* and *Qld Work Health and Safety Consultation, Cooperation and Coordination Code of Practice 2021*.

The PC must document consultation, cooperation, and coordination processes within the WHS Management Plan for the project.

### 9.2 Communication

The PC must establish processes for the distribution and communication of HSE information relating to the project, for example:

- inductions;
- pre-start meetings;
- toolbox talks;
- health and safety committee meetings;
- HSE Alerts, lessons learnt and bulletins; and
- noticeboards.

The PC should consider diversity aspects (e.g. gender, language, culture, literacy, disability) when determining communication methods.

The PC must share relevant HSE communications, such as HSE Alerts and industry learnings, with Stanwell.

## 10.0 Facilities and Amenities

The PC must provide and maintain adequate and accessible facilities in accordance with the *Qld Work Health and Safety Regulation 2011* and *Q Managing the Work Environment and Facilities Code of Practice 2021*, including but not limited to:

- drinking water;

- toilets;
- hand and face washing facilities; and
- dining facilities.

The PC must ensure that workers, including those who have particular needs or disabilities, have access to the facilities. All amenities are to be maintained in a hygienic, safe, and serviceable condition.

## 11.0 Site Security and Access

The PC must establish and implement processes to ensure that the project site is secured from authorised access, with consideration to:

- access authorisation processes;
- fencing;
- barricading and signage; and
- security monitoring.

## 12.0 Health and Wellbeing

### 12.1 Health Risk Assessment, Pre-Employment Medicals and Health Monitoring

The PC must manage any occupational health risks applicable to the project.

This may include the development of a Health Risk Assessment and establishment of processes for pre-employment medical assessments, occupational hygiene monitoring and periodic health monitoring, as determined to be relevant, in accordance with the *QLD Work Health and Safety Regulation 2011*.

### 12.2 Fitness for Work

The PC must ensure all workers, contractors and visitors attend site fit for duty and must have a fitness for work process that includes alcohol and other drugs management, and fatigue management.

#### 12.2.1 Alcohol and Other Drugs

The PC must establish and implement procedures for the management of alcohol and other drugs. This may include the implementation of an alcohol and other drug testing regime.

#### 12.2.2 Fatigue Management

The PC must have procedures and systems that demonstrate how it will manage fatigue in accordance with:

- *Qld Work Health and Safety Act 2011*;
- *Qld Work Health and Safety Regulation 2011*;
- *Heavy Vehicle National Law*;
- *Workplace Health and Safety Queensland – Preventing and Managing Fatigue Related Risk in the Workplace 2020*; and
- *Safe Work Australia – Guide for Managing the Risk of Fatigue at Work 2013*.

### 12.3 Psychosocial Safety

The PC must develop and implement processes for managing risks to workers' psychosocial health that may result from psychosocial hazards in accordance with the *Qld Managing the Risk of Psychosocial Hazards at Work Code of Practice 2022*.

The PC should consider undertaking a project specific Psychosocial Risk Assessment to identify appropriate control measures for managing the risk of relevant psychosocial hazards. The Psychosocial Risk Assessment should be reviewed regularly to ensure that it is up to date and captures changing or emerging risks in this space as the project progresses.

The PC should also ensure workers are aware of the wellbeing services available to them.

## 12.4 Rehabilitation and Return to Work

The PC must establish and implement rehabilitation and return to work processes in accordance with the:

- *Old Workers Compensation and Rehabilitation Act 2003*; and
- *Old Workers Compensation and Rehabilitation Regulation 2014*.

## 13.0 Personal Protective Equipment

The PC must determine Personal Protective Equipment (PPE) requirements for the project and enable the provision of PPE to workers in accordance with the *Qld Work Health and Safety Regulation 2011*.

The PC must provide workers with information, training, and instruction in the proper use, wearing, storage and maintenance of PPE.

Other persons, including visitors, to the project site must also be provided with PPE.

Where respiratory protective equipment (RPE) is required to control respiratory hazards, the PC must establish a RPE program including selection, fit testing, training, use and maintenance in accordance with *AS/NZS 1715:2009 – Selection, Use and Maintenance of Respiratory Protective Equipment*.

## 14.0 Incident Reporting and Investigation

The PC must establish and implement incident reporting and investigation procedures and incorporate the below requirements into their respective Management Plans.

### 14.1 Incident Reporting

The PC must notify Stanwell of any relevant HSE incidents immediately. These include, but are not limited to:

- incidents involving the death or serious injury or illness of its employees or those of its subcontractors;
- dangerous incidents or near miss events;
- dangerous or serious electrical incidents;
- high potential Incidents;
- worker exposure or potential exposure incidents;
- environmental incidents (e.g. spills, fauna injury/deaths, over-clearing etc.);
- notifiable incidents; and
- community complaints.

The PC must provide the following information with any incident notification to Stanwell:

- date, time and location of incident;
- description of events and actual/potential consequences;
- who was involved; and
- actions taken.

## 14.2 External Regulator Notification

In the event of a notifiable incident, the PC must notify the relevant regulatory authority (e.g. *Workplace Health and Safety Queensland (WHSQ)*, *Electrical Safety Office (ESO)*, *Department of Environment, Science and Innovation (DESI)*) in accordance with statutory timeframes. The PC must verbally notify Stanwell as soon as is reasonably practicable and provide a copy of the notification on the day that it is submitted.

The PC must provide Stanwell with a copy of any further Regulator correspondence in relation to the incident, including notices, infringements, penalties, etc. The PC must also provide evidence that the incident has been closed with the relevant Regulator.

If the notifiable incident relates to an environmental authority / approval / permit held by Stanwell, the PC must notify Stanwell who will undertake the notification to the relevant Regulator.

## 14.3 Investigation

The PC must undertake incident investigations in accordance with their investigation procedures and Management Plans.

The PC must provide a draft investigation in writing to Stanwell for review within seven days of the incident. The investigation must be finalised and closed out within 30 days of the incident. This timeline may change depending on the severity of the incident however will require approval from Stanwell.

Stanwell may conduct its own investigation into any incident and the PC must cooperate fully by providing prompt information about the incident and access to relevant documents and the PC's personnel.

## 15.0 Emergency Management

### 15.1 Emergency Management Plan

The PC must establish and implement an Emergency Management Plan for the project.

In developing the Emergency Management Plan, the PC must consider:

- the types of emergencies most likely to arise from their activities;
- identifying who must be contacted and notified in an emergency;
- evacuation locations;
- provision of emergency information to workers; and
- any necessary procedures for rescuing persons.

The Emergency Management Plan must include the following:

- an effective response to an emergency;
- evacuation procedures;
- identify key personnel with specific roles and responsibilities in emergency situations;
- notifying emergency service organisation and other relevant stakeholders at the earliest opportunity;
- medical treatment and assistance; and
- effective communication between the person authorised to coordinate the emergency response and persons at the workplace.

Where undertaking a project at a Stanwell generating site, the PC must also consider the Stanwell Emergency Management Plan and evacuation locations.

The PC must establish processes and a frequency for testing emergency procedures, including liaison with emergency services and other stakeholders, as appropriate. Learnings from

emergency drills, exercises and incidents must be documented, incorporated into revisions of the Emergency Response Plan and shared with workers and other relevant stakeholders.

The PC must also provide workers with information, training and instruction about implementing the Emergency Management Plan, including display of evacuation procedures on site.

## 15.2 First Aid

The PC must develop and implement processes for managing first aid for the project in accordance with the *Qld Work Health and Safety Regulation 2011* and *Qld First Aid in the Workplace Code of Practice 2021*.

## 16.0 Environmental Management

### 16.1 Environmental and Planning Approvals

The PC must establish and implement processes to ensure that the project is conducted in accordance with the relevant environmental and planning approvals, required by legislation, such as, but not limited to:

- *Environmental Protection and Biodiversity Conservation Act 1999;*
- *Qld Environmental Protection Act 1994 and Regulation 2019;*
- *Qld Vegetation Management Act 1999;*
- *Qld Nature Conservation Act 1992 and Regulations;*
- *Qld Aboriginal Cultural Heritage Act 2003;*
- *Qld Planning Act 2016 and Regulation 2017;*
- *Qld Land Act 1994;*
- *Qld Water Act 2000;*
- *Qld Fisheries Act 1994;*
- Development Codes, Development Approval;
- Local Laws; and
- Environmental Authority, where applicable.

The PC must ensure that all subcontractors and other applicable stakeholders have access to approval documentation.

The PC must ensure that the project CEMP outlines management and mitigation measures that will be implemented to ensure compliance with project's environmental and planning approvals and regulatory requirements.

### 16.2 Environmental Authority

The PC must ensure that the project is undertaken in accordance with the requirements of the Environmental Authority for the site, where applicable.

When undertaking projects at Stanwell generating sites with an existing Environmental Authority, the PC must review and comply with the *Stanwell Environmental Authority – Project Compliance Checklist (ENV-WI-20)* throughout all project phases.

### 16.3 Land and Vegetation Disturbance

The PC must establish and implement processes to ensure land and vegetation disturbance is managed in accordance with all environmental legislative requirements.

The PC must comply with the requirements of the *Stanwell Business Procedure: Land & Vegetation Disturbance (ENV-PROC-39)*, where relevant to the project.

All activities that classify as land and/or vegetation disturbance must have an approved *Stanwell Land and Vegetation Disturbance Permit (LVDP) (T-1985)* prior to the commencement. A LVDP request is required to be submitted a minimum of 10 working days prior to disturbance activities being undertaken.

The PC must ensure that all workers review and sign onto the LVDP and comply with any conditions and controls for land and vegetation disturbance.

The PC must also implement processes to ensure compliance with specific landowner access arrangements and requirements.

#### 16.4 Species Management Program

A Species Management Program (SMP) is required where an animal breeding place, as defined under Section 335 of the *Qld Nature Conservation (Animals) Regulation 2020*, has been identified and activities are proposed that would tamper with the breeding place.

The PC must ensure that the project is undertaken in accordance with the requirements of the approved SMP for the project site, where applicable.

#### 16.5 Emissions Reporting

The PC must establish and implement processes for emissions reporting as required by the *National Greenhouse and Energy Reporting Act 2007* and *Qld Environmental Protection Regulation 2019*. Where Stanwell has operational control of the project site location, the PC will be required to collect emissions data in line with the *National Greenhouse and Stanwell Energy Reporting System - Contractor Reporting Form (T-1779)* and provide to Stanwell to fulfil reporting obligations.

#### 16.6 Waste Reporting

The PC must establish and implement processes for waste reporting and regulated waste tracking as required by the *Qld Waste Reduction and Recycling Act 2011* and *Qld Environmental Protection Regulation 2019*.

#### 16.7 Sustainability

The PC should consider, where applicable, opportunities and contributions to the achievement of Stanwell's Sustainability Commitments throughout the lifecycle of the contract, including design and construction phases.

Stanwell's Sustainability Commitments include:

- reduce portfolio emissions and help ensure security of energy supply;
- safeguard the flora and fauna, land, and waterways around our sites;
- work with suppliers who help achieve our sustainability commitments;
- create transformative economic and social opportunity for our host communities as well as First Nations people; and
- ensure our people realise opportunities from the energy transition; and
- ensure our workplace is safe, inclusive, and diverse.

#### 16.8 Cultural Heritage

The PC must ensure all project works are undertaken in accordance with relevant legislation including the *Aboriginal Cultural Heritage Act 2003*, *Qld Heritage Act 1992*, and *Torres Strait Islander Cultural Heritage Act 2003*.

A Cultural Heritage Management Plan (CHMP) must be in place or prepared and approved, prior to commencement of any ground disturbance works.

The PC must ensure that construction activities are managed to maintain cultural heritage values of sites, place, and values within and adjacent to the project site. If during any activities

undertaken at the project site an item or object of potential Cultural Heritage significance is discovered, work shall cease immediately, an exclusion zone established, and the finding reported to Stanwell.

## 17.0 HSE Performance Reporting

The PC must establish HSE objectives and targets for the project, including a mix of 'leading' and 'lagging' indicators, including but not limited to:

Leading Metrics	Target	Measure
Critical Control Verifications (CCVs)	100% PC to advise number of CCVs planned per month.	% of CCVs performed against planned (target) during the reporting period.
Leadership site visits / interactions	100% PC to advise monthly target.	% of leadership site visits performed against planned (target) during the reporting period.
HSE Corrective Action Completion	Actions to be closed in agreed timeframe.	% HSE Corrective Actions completed (for closed event investigations and/or HSE Audit Reports)
Lagging Metrics	Target	Measure
The number of Serious Injury &/or Fatality (SIF) (Actual Impact) events	0	The number of Serious Injury &/or Fatality (SIF) (Actual Impact) events against target. Further information required – refer below.
The number of Serious Injury &/or Fatality (SIF) (Potential Impact) events	0	The number of Serious Injury &/or Fatality (SIF) (Potential Impact) events against target. Further information required – refer below.
The number of Events Notifiable to a Regulator (HS and E)	0	The number of Events Notifiable to a Regulator (HS and E) against target. Further information required – refer below.
Health, Safety and Environmental Enforcement Actions (Moderate Level 3 Compliance/Legal impact) or greater.	0	The number of HSE Enforcement Actions (Moderate Level 3 or greater Compliance / Legal) against target. Further information required – refer below.
Number of First Aid Injuries	N/A	Report number of first aid injuries.
Number of Medical Treatment Injuries	N/A	Report number of Medical Treatment Injuries. Further information required – refer below.
Number of Lost Time Injuries	N/A	Report number of Lost Time Injuries. Further information required – refer below.
Number of Regulatory Notices Received	N/A	Report number of Regulatory Notices Received. Further information required – refer below.

For applicable events (as indicated in the above table), the PC must provide the following HSE reporting information to Stanwell on a monthly basis (emailed by close of business by the second working day of the month):

- Notifiable Incidents: provide the following details for all health, safety and environmental notifiable incidents (e. g. where environmental harm has occurred, or might occur; and/or breaches to the conditions of an Environmental Authority (EA) (where applicable) that were reported to a Regulator during the reporting period (or should have been reported in accordance with WHS, Electrical Safety or Environmental laws):
  - notifiable incident classification under the applicable law (e.g., WHS Act, Electrical Safety Act, Environmental Protection Act);
  - event description;
  - immediate actions taken;
  - investigation findings;
  - corrective actions; and
  - lessons learned and how these have been or will be incorporated into the Contractor's operational policies and procedures.
- Work-related fatalities and injuries:
  - Lost Time Injuries (LTI) – Provide number of LTI events for the reporting period; and event summary, investigation findings and corrective actions (where applicable);
  - Medical Treatment Injuries (MTI) – Provide number of MTI events for the reporting period; and event summary, investigation findings and corrective actions (where applicable); and
  - First Aid Injuries (FAI) – Provide number of FAI events for the reporting period.
- HSE Enforcement Actions and HSE Regulatory Notices received:
  - provide details of HSE Enforcement Actions and/or HSE Regulatory Notice received from a Regulator during the reporting period. Such information should include clear explanation of the contravention and details of any fines and/or corrective action taken.

## 18.0 Stanwell Governance and Assurance

Stanwell will undertake monitoring and assurance review activities throughout all phases of the project. The PC will be required to make available any copies of HSE documentation considered relevant to providing Stanwell with assurance that HSE is being managed satisfactorily and in line with legislative requirements.

Stanwell will undertake targeted HSE audits against the project Management Plans and relevant legislation to determine performance and compliance. The PC must make all relevant HSE records including those of subcontractors and suppliers available upon request and provide reasonable assistance during the audits.

## 19.0 Corrective Action Management

The PC must establish and implement processes for the management of corrective and preventive actions, resulting from activities such as:

- audits;
- inspections;
- observations / interactions;
- risk assessments; and
- incident Investigations.

The PC must maintain a Corrective Action Register (or similar) and identify a time frame for closure, nominated person responsible for implementing and monitoring the action and monitoring for the effectiveness of controls.

The PC must provide corrective action plans and evidence to Stanwell of closure, where requested.

## 20.0 Site Handover

At the completion of the project, the PC must provide all required HSE documentation and deliverables as required by the Contract, Scope of Work, this Business Procedure and as outlined within the *Stanwell Project Site Handover – HSE Documentation Checklist (T-3904)*.

## 21.0 Document and Records Management

The PC must establish and implement processes for the creation, review, approval, dissemination, retention and disposal of documents and records in accordance with relevant legislative requirements. The PC must provide records to Stanwell upon request.

## 22.0 Responsibilities

### 22.1 Project Teams

Stanwell Project Teams will be responsible for:

- providing this Business Procedure to Principal Contractors;
- obtaining relevant documentation and information required by this Business Procedure from Principal Contractors; and
- managing project and Principal Contractor compliance to this Business Procedure.

### 22.2 Health, Safety and Environment Team

The Health, Safety and Environment Team will be responsible for providing advice and support to Project Teams to implement the requirements of this Business Procedure, including:

- reviewing Principal Contractor documentation;
- participating in project risk management activities;
- issuing Land and Vegetation Disturbance Permits;
- facilitating HSE performance reporting;
- undertaking governance and assurance activities; and
- overseeing regulatory engagement and maintaining records.

### 22.3 Principal Contractors

Principal Contractors will be responsible for complying with all requirements of this Business Procedure.

## 23.0 Review, Consultation and Communication

### Review:

This Document is required to be reviewed, as a minimum, every 5 years.

### Consultation:

Consultation will occur in accordance with the *Stanwell Business Procedure: HSE Consultation and Participation (HSE-PROC-13)*.

### Communication/Requirements after Update:

This Business Procedure will be communicated and available on the Stanwell Intranet and is to be made available to Principal Contractors via contractual documentation.

## 24.0 References

### Legislation

- GOC State Archives – Public Records Act
- Qld Work Health and Safety Act 2011
- Qld Work Health and Safety Regulation 2011
- Qld Workers Compensation and Rehabilitation Act 2003
- Qld Workers Compensation and Rehabilitation 2014
- Heavy Vehicle National Law
- Qld Electrical Safety Act 2002
- Qld Electrical Safety Regulation 2013
- Qld Environmental Protection Act 1994
- Qld Environmental Protection Regulation 2019
- Qld Environmental Protection (Air) Policy 2019
- Qld Environmental Protection (Noise) Policy 2019
- Qld Environmental Protection (Water and Wetland Biodiversity) Policy 2019
- Environmental Protection and Biodiversity Conservation Act 1999
- Qld Aboriginal Cultural Heritage Act 2003
- Torres Strait Islander Cultural Heritage Act 2003
- Qld Planning Act 2016
- Qld Regulation 2017
- Qld Land Act 1994
- Qld Nature Conservation Act 1992
- Qld Nature Conservation (Animals) Regulation 2020
- Qld Fisheries Act 1994
- Qld Water Act 2000
- National Greenhouse and Energy Reporting Act 2007

### Standards & Guidelines

- AS/NZS ISO 45001:2018 Occupational Health and Safety Management Systems
- AS/NZS ISO 14001:2016 Environmental Management Systems
- AS/NZS 1715:2009 – Selection, Use and Maintenance of Respiratory Protective Equipment
- Workplace Health and Safety Queensland – Preventing and Managing Fatigue Related Risk in the Workplace 2020

- Safe Work Australia – Guide for Managing the Risk of Fatigue at Work 2013
- AS/NZS 3012:2019 Electrical Installations – Construction and Demolition Sites

#### Business Procedures

Document No	Document Title
GOV-POL-38	Stanwell Risk Appetite Statement
GOV-STD-11	Stanwell's Risk Evaluation Matrix
ENV-PROC-39	Land & Vegetation Disturbance
HSE-PROC-13	HSE Consultation & Participation

#### Tools

T-3913	Mobilisation Readiness Checklist
ENV-WI-20	Environmental Authority – Project Compliance Checklist
T-1985	Land & Vegetation Disturbance Permit
T-3904	Project Site Handover – HSE Documentation Checklist

## 25.0 Definitions

Word / Abbreviation	Definition
<b>Construction Project</b>	Same meaning as the QLD Work Health and Safety Regulation 2011, Section 292. A project that involves construction work where the cost of the construction work is \$250,000 or more.
<b>Construction Work</b>	Same meaning as the QLD Work Health and Safety Regulation 2011, Section 289. Any work carried out in connection with the construction, alteration, conversion, fitting-out, commissioning, renovation, repair, maintenance, refurbishment, demolition, decommissioning or dismantling of a structure.
<b>Critical Controls</b>	A highly relied upon control that is crucial to preventing the occurrence of an unwanted event or mitigating the consequences of the unwanted event if it did occur. The absence or failure of a critical control would significantly increase the risk of environmental harm, serious injury or fatality (SIF) despite the existence of the other controls.
<b>Critical Control Verification</b>	Critical Control Verification (CCV) is a systematic and proactive approach to auditing and identifying critical controls that are potential precursors to SIF exposure.
<b>Hazard</b>	A situation or thing that has the potential to harm a person.

<b>High Risk Construction Work</b>	<p>Construction work that:</p> <ul style="list-style-type: none"> <li>a) involves a risk of a person falling more than 2m; or</li> <li>b) is carried out on a telecommunication tower; or</li> <li>c) involves demolition of an element of a structure that is load-bearing or otherwise related to the physical integrity of the structure; or</li> <li>d) involves, or is likely to involve, the disturbance of asbestos; or</li> <li>e) involves structural alterations or repairs that require temporary support to prevent collapse; or</li> <li>f) is carried out in or near a confined space; or</li> <li>g) is carried out in or near— <ul style="list-style-type: none"> <li>(i) a shaft or trench with an excavated depth greater than 1.5m; or</li> <li>(ii) a tunnel; or</li> </ul> </li> <li>h) involves the use of explosives; or</li> <li>i) is carried out on or near pressurised gas distribution mains or piping; or</li> <li>j) is carried out on or near chemical, fuel or refrigerant lines; or</li> <li>k) is carried out on or near energised electrical installations or services; or</li> <li>l) is carried out in an area that may have a contaminated or flammable atmosphere; or</li> <li>m) involves tilt-up or precast concrete; or</li> <li>n) is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians; or</li> <li>o) is carried out in an area at a workplace in which there is any movement of powered mobile plant; or</li> <li>p) is carried out in an area in which there are artificial extremes of temperature; or</li> <li>q) is carried out in or near water or other liquid that involves a risk of drowning; or</li> <li>r) involves diving work.</li> </ul>
<b>HSE Corrective Action Completion</b>	<p>The percent of HSE Corrective Actions completed (for closed HSE event investigations and/or HSE Audits reports). The following formula applies: (Number of completed actions divided by Number of total actions) x 100.</p>
<b>HSE Enforcement Action (Moderate Level 3 impact or greater)</b>	<p>An incident involving a breach of legislative or regulatory obligation(s) resulting in moderate fines (or greater) and/or legal proceedings (instituted by an external body or Regulator).</p> <p>Note: This is in alignment with the Stanwell’s Risk Evaluation Matrix (GOV-STD-11) for Moderate Level 3 (or greater) Compliance/Legal Risk category i.e. Breach, repeated breaches or ongoing breaches of legislative or regulatory obligation/s for which there are moderate fines (\$10,001 - \$100,000 or greater) issued or likely to be issued and/or administrative action taken by a regulator to prevent or rectify the breach/s (e.g. environmental evaluation).</p>
<b>HSE Notifiable Incident</b>	<p>Any incident reported to a state-based regulator as per the requirements outlined in that state’s work health and safety and/or environmental legislation.</p>

<b>Land and Vegetation Disturbance</b>	<p>Land and vegetation disturbance includes the following:</p> <ul style="list-style-type: none"> <li>• Ground Disturbance – any activity that will break the ground surface or the surface rock layer of the ground, including but not limited to tracked vehicle movements (bulldozer, excavator), post hole digging, excavation works, stockpiling activity (e.g., of soil or vegetation), grading, ripping, ploughing, dredging, blasting, drilling, placing of fill etc. Includes movement of soil from one location to another location. Excludes rubber tyre vehicle movements;</li> <li>• Vegetation Disturbance – pruning, thinning, trimming, clearing, burning etc. of vegetation; and</li> <li>• Work in the beds or banks of a watercourse, lake or spring - work along a watercourse bed or bank refers to the land that is within the line along the outer limits of the defined channel of the watercourse (i.e. that following the highest points of land in the channel that are covered by the watercourse water, whether permanently or intermittently); Excludes carrying out weed spraying, monitoring, surveying or inspections.</li> </ul>
<b>Leadership site visits / HSE interactions:</b>	<p>Planned site visits by leaders / managers which include observation of work activities being undertaken and/or HSE interactions with the workforce. A HSE Interaction is a proactive way to discuss expectations, behaviours and values. It may also be used to discuss aspects of the activity that deserve positive recognition or indicate opportunities to improve.</p>
<b>Licensed Construction Area (LCA)</b>	<p>A designated area of a construction project established only where the construction work meets the Queensland Building and Construction Commission (QBCC) licenced building work threshold and is carried out by a QBCC-licenced contractor.</p>
<b>Principal Contractor</b>	<p>Same meaning as the QLD Work Health and Safety Regulation 2011, Section 293.</p> <p>The person engaged as principal or main contractor for a Construction Project in accordance with the WHS legislation.</p>
<b>Reasonably Practicable</b>	<p>Same meaning as the QLD Work Health and Safety Act 2011, Section 18.</p> <p>In relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters including—</p> <ul style="list-style-type: none"> <li>(a) the likelihood of the hazard or the risk concerned occurring; and</li> <li>(b) the degree of harm that might result from the hazard or the risk; and</li> <li>(c) what the person concerned knows, or ought reasonably to know, about— <ul style="list-style-type: none"> <li>(i) the hazard or the risk; and</li> <li>(ii) ways of eliminating or minimising the risk; and</li> </ul> </li> <li>(d) the availability and suitability of ways to eliminate or minimise the risk; and</li> <li>(e) after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available</li> </ul>

	ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.
<b>Risk</b>	Combination of the likelihood of occurrence of an event and the severity that can be caused by the event.
<b>Safe Work Method Statement</b>	<p>Same meaning as the QLD Work Health and Safety Act 2011, Section 299.</p> <p>A safe work method statement must—</p> <p>(a) identify the work that is high risk construction work; and</p> <p>(b) state hazards relating to the high risk construction work and risks to health and safety associated with those hazards; and</p> <p>(c) describe the measures to be implemented to control the risks; and</p> <p>(d) describe how the control measures are to be implemented, monitored, and reviewed.</p>
<b>Serious Injury or Fatality (SIF)</b>	<p>A work-related injury that results in:</p> <ul style="list-style-type: none"> <li>• Fatality; or</li> <li>• Life-Threatening Injury - An injury that, if not immediately treated, is likely to lead to the death of the affected individual, and will usually require the intervention of internal and/or external emergency response personnel to provide life-sustaining support; or</li> <li>• Life-altering injury - An injury that results in permanent or long-term impairment; or loss of use of an internal organ, body function, or body part.</li> </ul>
<b>Worker</b>	Same meaning as the QLD Work Health and Safety Act 2011, Section 7.

## 26.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorse/Check	Approved By
0	21.08.2024	Procedure created to outline minimum requirements for Principal Contractors undertaking Construction Projects for Stanwell	Whitney Tobin / Jayde Smith	Shane Lubbe / Carel Rothman	Kriss Ussher
	19.08.2025	<p><b>MINOR CHANGE</b> – Minor change made to ensure the procedural deliverables and hold-points required are applicable to either a 'Project Site' or an 'LCA', depending on the Project.</p> <p>No increase to Rev No or Date as noted by Jayde Smith</p>	Jayde Smith		