



Isolation of Hazardous Energies Associated with Plant in Western Australian Mining Operations Draft Guideline

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About CME

The Chamber of Minerals and Energy of Western Australia (CME) is the peak resources sector representative body in Western Australia funded by its member companies, which generate 95 per cent of the value of all mineral and energy production and employ 80 per cent of the resources sector workforce in the state.

The Western Australian resources sector is diverse and complex, covering exploration, processing, downstream value adding and refining of over 50 different types of mineral and energy resources.

In 2014, the value of Western Australia's mineral and petroleum production was \$114.1 billion. Iron ore accounted for approximately \$65.1 billion of production value to be the state's most valuable commodity. Petroleum products (including LNG, crude oil and condensate) followed at \$25.1 billion, with gold third at \$8.7 billion.¹

Notwithstanding the recent decline in the price of several export commodities, the estimated value of royalty receipts the state received from the resources sector still composed almost 20 per cent of estimated total state revenue in 2014-15, or around \$5.34 billion.²

As at March 2015, there was approximately \$179 billion in resources sector projects committed or under construction in Western Australia and a further \$118 billion in proposed or possible projects.³

Recommendations

- The requirements in the Guideline relating to identification of roles responsible for certain activities, in particular the responsibilities assigned to Departmental and Business Unit Managers should be amended to enable operations to implement procedures suitable to their specific organisational structures.
- CME recommends DMP amend the section on permit-to-work systems to allow flexibility around the display location of permits.
- CME recommends the Guideline requirement for group isolations to be completed by two people be amended to remove the need for the individuals involved to hold the 'same level of competence in isolation application' to ensure flexibility for a risk based approach and allow for variation in the size and complexity of operations.
- CME recommends DMP amend the section on restricted entry to workshop and breakdown areas to enable individual operations to develop relevant procedures tailored to the workplace to minimise the risk of exposure to hazardous energies rather than requiring all operations to restrict entry in these circumstances
- CME recommends DMP consider including reference to other relevant resources and training packages, in addition to the national Resources and Infrastructure Industry Training Package unit to facilitate companies tailoring internal training programs for site isolating and permitting systems based on individual business needs.

¹ Department of Mines and Petroleum (DMP), *Mineral and Petroleum Industry 2014 Review*, 2015, www.dmp.wa.gov.au/1525.aspx, p. 1

² Government of Western Australia, *2015-16 Budget, Budget Paper No. 2 Volume 2*, www.ourstatebudget.wa.gov.au/Budget-Papers, pp. 541 & 593

³ DMP, 2015, *loc. cit.*

Context

CME appreciates the opportunity to comment on the Draft Guideline – Isolation of Hazardous Energies Associated with Plant in Western Australian Mining Operations (the Guideline). Hazardous energies continue to pose a risk to workers in the Western Australian resources sector where a significant number of fatal and serious injuries have occurred.

The Western Australian resource sector places the highest priority on ensuring the safety and health of the workforce and is committed to continuous improvement across all aspects of safety and health management. CME members recognise the potential hazards associated with exposure to hazardous energies and welcome the Department of Mines and Petroleum's (DMP) focus on this important issue.

In light of ongoing incidents involving hazardous energies associated with plant in the resources industry, CME agrees this is an issue which requires attention and supports the development of risk based guidance material

To achieve better safety outcomes, CME supports:

- a risk based, outcomes-focused approach to legislation which encourages proactive compliance and innovation in the way in which risks are managed;
- regulation which is streamlined, easy to understand and minimises regulatory and administrative burden; and
- consistency (where appropriate) between legislation and across jurisdictions to increase efficiencies and remove complexity for operators.

CME is supportive of the development of guidance material structured to support a risk management approach to the isolation of hazardous energies associated with plant. However industry has expressed concern regarding the prescriptive nature of certain requirements outlined in the draft Guideline. These have been outlined in further detail below.

In progressing the Guideline, CME encourages DMP to continue to engage closely with industry to ensure amendments deliver improvements in safety while minimising unintended impacts such as administrative burden and costs.

Specific Comments on the Draft Guideline

Comments against specific sections of the Guideline are provided for consideration and should be read in the context of the comments above.

Roles and responsibilities

Clarity regarding roles and responsibilities is important. However, there is some concern with the Guideline in relation to the overly prescriptive requirements in section 3.4 as these specific roles may not be appropriate for every business. In particular, the role of Departmental and Business Unit Managers includes responsibility to ensure "remedial actions and necessary plant modifications are implemented for identified hazards".

Given the diversity of operations other roles may also be accountable for isolation procedures depending on business requirements and some flexibility is needed to allow for variation in operations. The Guideline should require the operation to identify who has these responsibilities rather than prescribe who it is to be. CME considers this change would facilitate a site specific risk based approach promote proactive compliance.

The requirements in the Guideline relating to identification of roles responsible for certain activities, in particular the responsibilities assigned to Departmental and Business Unit Managers should be amended to enable operations to implement procedures suitable to their specific organisational structures.

Permit-to-work system

The management of isolations as part of permit-to-work systems and the need to ensure activities are reviewed and controls implemented by a competent and authorised person is supported. However, section 4.3 should be amended to allow for flexibility around the display location of permits depending on individual business requirements. For complex operations there are frequently multiple permits in place at any one time, with multiple parties working under one or more permits.

Allowance for the use of a central location for more complex operations would allow for other work crews to identify all permits currently in place providing a better understanding of all work taking place that could impact on their work area (e.g. conveyor systems with control points not at the site of work).

Flexibility is important not only for convenience in these cases but also to allow sites to determine the placement of permits to maximise crew awareness of these and to improve safety outcomes as far as possible based on each sites unique operating environment. Flexibility for a risk based approach is required.

CME recommends DMP amend the section on permit-to-work systems to allow flexibility around the display location of permits.

Group Isolation

CME agrees isolation locks used for the purpose of group isolations require application of high level security to prevent misuse by unauthorised personnel and ensure the safety of those in the vicinity of the work being carried out.

In section 4.4 of the guideline, DMP has specified “group isolations should be installed by a minimum of two people with the same level of competence in isolation application and knowledge of the hazardous energy sources being isolated”.

This requirement, as currently drafted, may reduce flexibility within operations to perform multiple permits with current site teams and/or structures. For example, mechanical work being undertaken on plant will frequently require an electrical (or high voltage) isolation to be in place; the mechanical fitter completing the work does not require the same level of knowledge of the electrical energy source as the electrician as it is not relevant to his/her work being completed.

CME agrees it is important to ensure individuals are competent to perform their work, however, questions the benefits to safety of requiring individuals to obtain a level competency beyond their level of responsibility as would be the case in the example above. It is important these requirements in Guideline allow for companies to take a risk based approach when determining competency requirements for staff involved in this type of work.

CME recommends the Guideline requirement for group isolations to be completed by two people be amended to remove the need for the individuals involved to hold the ‘same level of competence in isolation application’ to ensure flexibility for a risk based approach and allow for variation in the size and complexity of operations.

Restricted Entry

The prevention of inadvertent exposure to hazardous energies for workers in the vicinity of plant or equipment being worked on is supported. Workshops and breakdown areas can be hazardous areas and there is a need to implement appropriate controls to reduce the risk as far as practicable. However, it is critical companies have the flexibility to implement a risk based approach around restricting entry suitable to their particular operation.

It is necessary to allow for individual operations to determine appropriate controls through the completion of a risk assessment regarding workers entering into the vicinity of plant or equipment being worked on.

CME recommends DMP amend the section on restricted entry to workshop and breakdown areas to enable individual operations to develop relevant procedures tailored to the workplace to minimise the risk of exposure to hazardous energies rather than requiring all operations to restrict entry in these circumstances.

Training and Competency

CME agrees it is important to promote awareness and development of workforce competencies regarding the risks associated with hazardous energies in relation to plant and the controls required to work safely in this context. There is merit in further efforts to ensure information around effective controls are communicated broadly across the industry.

The intent to ensure workers are well trained and aware of the risks is supported and notes section 7.1 of the Guideline includes a requirement to consider relevant national units of competency and specifically references the Resources and Infrastructure Industry (RII) Training Package unit RIISAM202D Isolate and Access Plant.

This section could be improved by including additional references to other relevant resources and infrastructure training package units. It would allow individual businesses to determine the most appropriate competency standards required for that site to best ensure the safety and health of the workforce.

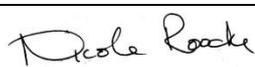
While it is useful to refer to the RII Training Package, CME notes specifying only one of these units could be interpreted as a minimum standard which could also unintentionally drive 'tick the box' compliance and reduce company's proactively going above and beyond these standards.

CME recommends DMP consider including reference to other relevant resources and training packages, in addition to the national RII Training Package unit to facilitate companies tailoring internal training programs for site isolating and permitting systems based on individual business needs.

Conclusion

CME welcomes the opportunity to contribute to the draft Guideline for Isolation of Hazardous Energies associated with Plant and looks forward to ongoing engagement with DMP on the development of guidance material to support a best practice risk based approach to regulation in the resources industry.

If you have any further queries regarding the above matters, please contact Alana Outram, Policy Advisor – Workplace Health and Safety on (08) 9220 8522 or a.outram@cmewa.com.

Authorised by	Position	Date	Signed
Nicole Roocke	Deputy Chief Executive	7 September 2015	
Document reference	K:\Occupational Safety & Health\Projects & Issues\Codes of Practice and Guidelines\Isolation\150907-OHS-CME Draft Submission-Isolation-draft Guideline-v1.0.docx		