VERIFICATION FINDINGS REPORT

AUSTRALIAN POWER PARTNERS BV & OTHERS - APPBV & OTHERS
HAZELWOOD MINE – MIN 5004

JULY 2013
Revision 3

Workplace Hazards & Hazardous Industries Group
WorkSafe Victoria
Level 26, 222 Exhibition Street, Melbourne 3000

DOCUMENT REVISION RECORD

Rev	Date	Description/Comments	Prepared by	Reviewed by
0	16/07/2013	Draft prepared for Inspector use and review	Tony Ferrazza	Inspectors
1	6/10/2013	Draft prepared for peer review and site delivery	Tony Ferrazza	Kevin Hayes
2	10/10/2013	Issued to operator for comment	Tony Ferrazza	APPBV
3	8/11/2013	Finalised report including site comments and action plan	Tony Ferrazza	

WorkSafe Internal Review (Completed after finalisation of report)

Reviewed By	Confirmed	Comment
Manager – Earth Resources	Rob Kelly	30/12/13.

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1. EXECUTIVE SUMMARY

The verification of Hazelwood Mine (HM) occurred over two days on 25th and 26th of July 2013, and covered Safety Management System (SMS) elements, Safety Assessments (SA) and procedural controls relating to the identified Major Mining Hazard (MMH) - Traffic Management.

Seven control measures (CM) and two SMS elements were reviewed, and where applicable, inspected during the verification. The verification sought to determine the level of implementation and functionality of each element, and a rating system of Yes/No/In Part was applied to each finding combined with a numeric value. Please refer to Attachment B for more detailed information

This rating information will be used to compare results with future verifications at HM and for comparison across other Victorian mine sites.

The key findings of the verification were mixed, with deficiencies found in the following areas relating to the management of Contractors, Training and Traffic movement:

- Road maintenance and design standards varied throughout the site and appear to be based on personal criteria rather than specific compliance to site procedures and standards.
- Road safety inspections (daily/monthly) are not being documented. This means findings or trends are not identified or auditable.
- Site vehicle pre-starts were not being conducted by some contractors and auditing activities are not sufficient in identifying these issues.
- Site vehicle requirements (fit for purpose) have not been determined; a plant register as described in site documents does not exist. Due to the recent commencement of a new overburden pre-strip contractor, mobile plant (haul truck) service/maintenance records were not readily available.
- Driving licence records were found to be inconsistent, with management unable to provide evidence of contractor driver licences and/or driver competencies for infrequently used/itinerant contractors.
- Road signage was found to be inadequate resulting in two improvement notices.
- Hazelwood is not managing their site contractors as per the site documented (SMS) process.
- The Annual Training Plan Procedure has not been followed. A training budget was identified but training plans for each individual employee had not been developed.

Of the seven selected control measures one was found to be implemented, five implemented In Part and one Not Implemented. In addition, four were found to be functional In Part and three were rated as not functional. The reasons for these findings were based on gaps between formal standards for road activities and what was practiced in the field, and are further discussed in section 4.1.

Of the two SMS elements, both were found to be implemented In Part and Not Functional, resulting in two systems Improvement Notices. The reasons for these findings are discussed further in section 4.2.

Recommendations for improvement that were identified during the Inspection are summarised in the Recommendations and Conclusions section of the report, and are detailed in the report. These recommendations will be carried forward as part of WorkSafe's oversight of the mine.

Two additional Improvement notices were issued with regard to traffic signage.

2. OBJECTIVES OF THE VERIFICATION

The objectives of the Verification process are to:

- Identify areas where strategic intervention is required.
- Ensure regulatory breaches or non-conformances detected during the inspection are appropriately dealt with.

- Assess whether or not a mine operator is providing a satisfactory level of Safety Management.
- Provide feedback and recommendations to the mine operator so that they can improve the level of safety management at the mine.

3. METHODOLOGY

3.1 Justification of Inspection Focus

The purpose of the inspection was to gather information, and where appropriate, inspect a sample of control measures and SMS elements used for the management of Traffic associated hazards.

Prevention of TM related incidents, were identified by WorkSafe as a priority to be verified across the Victorian mining sector. Additionally, WorkSafe have been notified by the operator of five separate incidents involving traffic management since May 2011.

Issued entry reports contain a summary of the activities conducted, issues identified and documents voluntarily provided by Hazelwood. Refer to Attachment C and Attachment D for further detail.

3.2 Verification Team

Duration: 2 Days	Start: 25/07/2013	Finish: 26/07/2013	Control Measure Verified	SMS Element Verified
Agency	Name	Role		
WorkSafe	Kevin Hayes	Lead Inspector	CM5, CM7	SMS1, SMS2
WorkSafe	Christopher Walschots	Senior Inspector	CM1, CM2, CM6	
WorkSafe	Michael Terry	Inspector	CM3, CM4	
WorkSafe	Tony Ferrazza	Senior Mining Engineer	CM3, CM4, CM6	

Table 1: Verification Team Details

4. INSPECTION FINDINGS

4.1 Control Measure Findings

Seven control measures were verified with differing levels of implementation and functionality as shown in Table 2 below. Two Improvement notices were issued with regard to road signage. Recommendations for achieving higher levels of compliance for "In Part" rated controls is provided within section 5.2 – Recommendations.

Control Measure	Implemented	Functional	Level	Comments
CM 1: Road Maintenance Program	In Part	In Part	3	Standards varied throughout the site and are based on personal criteria rather than specific compliance to sections 2.2 and Section 2.5 of V9.
CM 2: Safety Inspection of Roads	In Part	In Part	3	Inspections (daily/monthly) are not being documented, making auditing activities impossible.

Control Measure	Implemented	Functional	Level	Comments
CM 3: Plant Pre-Start Checks	In Part	No	2	Contractor pre-starts not being conducted, auditing activities are not sufficient in identifying these issues.
CM 4: Vehicle 'Fit for Purpose'	In Part	No	1	Site vehicle requirements have not been determined; a plant register as described in site documents does not exist.
CM 5: Competent and/or Licensed Operators	In Part	In Part	3	Follow-up mechanisms not adequate – if an employee 'chooses' not to provide a current driver licence. An improvement notice was issued.
CM 6: Signage (Road/Speed Limits etc)	Yes	No	3	Advance hazard signage has not been installed. Regular maintenance is not being carried out. An improvement notice was issued.
CM 7: Contractor Management Process (Driver licences and training)	No	No	0	Management were unable to provide evidence of contractor driver licences and/or driver competencies for infrequently used/itinerant contractors.

Table 2: Control Measure Findings Summary

4.2 Safety Management System Findings

Under current legislation HM is deemed a "prescribed mine" and is subject to OH&S regulation 5.3.21, which requires an operator of a prescribed mine to establish and implement a SMS. Sub regulation (3)(d) further requires that the SMS must contain a description of the Safety Assessment (SA) under regulation 5.3.23.

HM operates under the guidance of a site SMS; from which two elements, Contractor Management and Training, were assessed during the verification. These were tied into the Traffic Management control measures in regard to training of light vehicle drivers (both permanent employees and contractors) to comply with the abovementioned controls. The resulting levels of compliance and a brief summary are shown in Table 3.

WorkSafe issued two Improvement Notices (one for Contractor Management and the other for Training) under Regulation 5.3.21 of the Occupational Health and Safety Regulations 2007.

WorkSafe observed that the operator's SMS contains a process for Contractor Evaluation V6 (Doc. I.D. 3210), that is to be followed to ensure contractors have safe systems of work in place to meet or exceed the practices and policies required by the operator of the mine.

SMS Element	Implemented	Functional	Level	Comments
SMS 1: Contractor Management	In Part	No	1	Hazelwood is not managing their site contractors as per the site documented (SMS) process. An improvement notice was issued.
SMS 2: Training	In Part	No	1	Annual Training Plan Procedure has not been followed. An improvement notice was issued.

Table 3: SMS Element Findings Summary

5. RECOMMENDATIONS AND CONCLUSIONS

5.1 Strategic or Regulatory Intervention

When viewed against each of the objectives of the Verification process in Section 2, the inspection team concluded:

Objective	Findings
Identify areas where strategic intervention is required (subject to oversight visits and possible compliance and enforcement actions).	Due to the recent commencement of a new overburden prestrip contractor, mobile plant (haul truck) service/maintenance records were not readily available. These maintenance systems will be checked during future oversight visits as well as compliance with the SMS Contractor Management process.
Ensure regulatory breaches or non-conformances detected during the inspection are appropriately dealt with.	Four Improvement Notices were issued: 1. Inadequate advanced height restriction warning systems for vehicle and plant work under road tunnels and conveyors at the MIN5004(Hazelwood coalfield) (V00048403551L 111-01) 2. Failing to maintain regulatory signage within Coal field roads at MIN5004 (Hazelwood CoalField) workplace (V00048403551L 111-02) 3. Failing to develop an annual training plan for all employees as required under the ACM safety management system. (V01017400348L 111-01) 4. Failing to follow the 'SMS Evaluation of Contractors' process. (V01017400348L 111-02)
Assess whether or not a mine operator is providing a satisfactory level of Safety Management.	Findings from this Verification indicate that HM is not providing a satisfactory level of safety management in relation to all the topics verified. Deficiencies were identified (and supported by Improvement Notices) in the areas of traffic signage, development of an annual training plan and following the SMS Contractor management process. Opportunities for improvement have been identified and are discussed further within sections 4.1, 4.2 and 5.2. There has been a marked improvement in the site response to the verification process compared with previous years as well as in the development of the site Safety Assessment, however the lack of availability of key personnel during the verification was noted at the closeout meeting. This was discussed with the view of improving the verification planning for next year.

5.2 Recommendations

A number of recommendations have been made based on the findings of this verification. These are listed in abbreviated form here. The reader should refer to the detailed findings in Attachment A for further detail and recommendation reasoning.

Note: Compliance with the issued improvement notices will address a number of recommendations listed below.

Provide feedback and recommendations to the mine operator so that they can improve the level of safety management at the facility.	**Control Measure 1: Road Maintenance Standard** 1. Review 'Traffic Control and Haul Road Management Procedure' (V9) to reflect current practices and provide training to those responsible for designing, inspecting and maintaining the mine road conditions, and furniture to ensure that road inspections and maintenance is performed according to the site standard. 2. Conduct risk assessments on the use of flagging at intersections where flagging is used in lieu of hard separation controls such as earth bunds or transportable barriers; particularly in preventing vehicle collisions 3. Conduct risk assessments on the use of 450mm diameter water pipe as edge protection. 4. Repair/maintain the Armco rails/barriers in the areas above travelling conveyors M860. **Control Measure 2: Safety Inspection of Roads** 5. Document/record the daily supervisor inspections of haul roads as per Traffic Control and Haul Roads Management Procedure (V9, p. 28). 6. Document/record the monthly haul roads inspections as per Traffic Control and Haul Roads Management Procedure (V9, p. 28). 7. Develop a road classification system for different road types which specifies construction and maintenance standards - to include in the road inspection process. 8. Conduct risk assessments where appropriate as per the Traffic Control and Haul Roads Management Procedure (V9, p. 28). 9. Create a mine road site map that documents the standards allowing for the location of defects, current traffic furniture, intersection types, underpasses/plant structures and traffic hazards/control arrangements that can be referenced on the SWIs when they are undertaken. 10. Consider the use of GPS applications to assist in tracking road maintenance and developments. **Control Measure 3: Plant Pre-Starts** 11. Conduct specific auditing to ensure all employees including contractors conduct pre-start inspections. 12. Ensure all mobile plant and light vehicle log books, and pre-start checklists are readily available. 13. Review vehicle servicing schedules/frequencies in line with their operating environment. 14. Review all contractor vehicle maintenance procedures to ensure they comply with

site policy.

Control Measure 4: Vehicle 'Fit for Purpose'

15. Develop fit for purpose standards for all vehicles that are required to enter the mine.
16. Ensure Two Way radio requirements are clear in the site vehicle standard.
17. Develop a plant register.
18. Develop a standard test criterion for the light vehicle fleet review process.

Control Measure 5: Competent and/or Licensed Operators

19. Clearly define 'appropriate authorisation' and document the mandatory requirements for driving within the mine (i.e. current Victorian Driver's licence, 4X4 training and light vehicle recovery, familiarisation with related / relevant procedures etc).
20. Implement a system that prevents an employee from driving within the mine if the employee's driver licence has expired. Mechanisms are available including cancellation of the site access card, random auditing and follow-up by senior management if an employee 'chooses' not to provide a current driver's licence to there supervisor.
21. Review documents V8 – Traffic Management Procedure (Doc. I.D. 48590), V15 – Training package MNC 04 – Operate light vehicle (Doc. I.D. 45098) and V53 site induction. WorkSafe observed inconsistencies relating to parking distances from operational plant. V8 (p 12) and V53 (p 14) state 30 metres whilst V15 (p 19) states 40 metres.
22. Provide specific driver 'refresher' tool box topics including, but not limited to:
    - Traffic Management Procedure (Doc. I.D. 48590);
    - Other related procedures as listed within the Traffic Management Procedure (p 5); and
    - Traffic Control and Haul Roads Management Procedure (Doc. I.D. 42664)

Control Measure 6: Signage (Road/Speed Limits etc)

23. Ensure that the road signage/furniture complies with the site standard.
24. Audit the site's haul roads to ensure that applicable signage has been installed and is compliant with the site standard.
25. Install advance hazard signage where applicable (as per Improvement Notice V0004840355 1L/111-02.
26. Assign responsible persons for regular inspections and maintenance.

Control Measure 7: Contractor Management Process

27. Conduct a licencing audit of all site contractors (who are required to drive within the mine), ensuring that they have current driving licences and that records are kept and maintained.
28. Conduct the relevant site specific driver training for those contractors who are required to drive within the mine, including (but not limited to):
    - Traffic Management Procedure (Doc. I.D. 48590);
    - Other related procedures as listed within the Traffic Management

	Procedure (p 5); • Traffic Control and Haul Roads Management Procedure (Doc. I.D. 42664); and • Operate Light Vehicle Manual – incorporating 4X4 training (Doc. I.D. 45098). **SMS Element 1: Contractor Management** 29. Review/revise the document titled 'SMS Evaluation of Contractors' (Doc. I.D 3210). 30. Document responsibilities of Contract Managers, Responsible Officers, the Health and Safety Manager and the contractor. 31. Provide training to those that have the allocated responsibilities. 32. Ensure that the appropriate forms are completed, submitted and reviewed as per SMS Evaluation of Contractors' (Doc. I.D 3210). 33. Maintain records for auditing and inspection purposes. 34. Schedule regular audits of the Contractor Management/evaluation process. **SMS Element 2: Training – Mobile Plant/Plant Operations** 35. Develop the annual training plan as per the site procedure. 36. Identify training needs (in consultation with employees) in relation to performing work activities competently, including OHS training. 37. Review the allocated training resources (personnel and budgets). 38. Assess personnel as competent, on the basis of skills achieved through education, training or experience, to perform assigned tasks taking into account the OHS obligations, hazards and risks associated with the work activities. 39. Training to be carried out by persons with appropriate knowledge, skills, and experience in OHS and training. 40. Conduct regular audits of training delivery ensuring that training is consistent and valid.

5.3 Conclusions

The inspection identified a number of areas where HM were deemed deficient in the implementation and functionality of the control measures and SMS elements verified. Specific recommendations identified during the Verification are found in sections 4.1, 4.2 and 5.2, and are discussed further in Attachment A of this report.

Traffic management appears inadequate when compared against site standards for road design and maintenance. Several controls were found not to be fully implemented or functional, as supported by discussions held with relevant personnel and inspection of the road system.

As part of TM, site vehicles could not be verified as 'fit for purpose' as there were no formal vehicle standards, and contractors were not completing pre-starts checks on vehicles.

In addition, the training system for recording the competency of vehicle drivers was not adequately implemented or functional. This was demonstrated by analysis of the training records and discussions with training personnel.

The standard of road signage was found unsatisfactory resulting in two improvement notices.

HM was found not to be managing their site contractors as per the site documented (SMS) process.

Developing the site SMS elements in unison with adequate safety control measures still presents a challenge with findings from the verifications showing ongoing gaps in the elements of training, contractor management, planning, consultation, defect rectification and auditing. There will be an increasing focus in these areas in future verifications.

6. ATTACHMENT A - Detailed Inspection Findings

6.1 Control Measure 1: Road Maintenance Standard

MMH Control	Key areas of interest / Inspection Guidance
CM 1: Road Maintenance Program	**Reference Material:** V9 - Doc ID 42664 Traffic Control and Haul Road management Procedure. V16 - MMH2 GDF Suez Hazelwood Major Mining Hazard 2 Mobile Plant Interactions Draft V2 June 2013 V18 - SC 0110 Road Maintenance Program including regular grading and road surfacing material **Purpose of Control:** To ensure that Mine Roads, including Haul Roads, are maintained in optimum condition **Performance Information:** ***Implemented:*** 1. Have responsibilities been allocated for inspecting the condition of mine roads? (Note: a list of responsible persons is included in V18). 2. Are the mine roads being maintained to a standard? 3. How are mine road defects reported, actioned and closed out? ***Functional:*** 1. Evidence that relevant mine personnel understand their responsibility for inspecting mine road conditions for maintenance. 2. Evidence that roads are being maintained to a standard. (V9 covers: Sect 2.5 Construction – material requirements, 2.6.1 Road widths, - single and double lane, 2.6.2 Grades). Evidence that intersections are maintained to the standard layout and signage requirements as in V9 p. 30 for Mine Haul Roads and p31 for standard roads). 3. Evidence that road safety berms are maintained to the standard (V9 Sect 2.7.1 Intersections – note the use of flagging/or berms at intersections (Is this adequate?) V9 Sect 2.9 Safety Berms and barriers and use of 450mm diameter water pipes as edge protection (is this based on a risk assessment?) 4. Evidence of mine road defect reports, work orders created and maintenance carried out.

Findings (Fact & Opinion)

Implemented:

1. **Have responsibilities been allocated for inspecting the condition of mine roads? (Note: a list of responsible persons is included in V18).**

   Yes. WorkSafe observed that the following employees have direct Supervision for road maintenance and condition. These are-

   Sam Conway, Mine Civil Field Engineer; Brad Marvin, Mine Engineer for Design and of Civil Infrastructure;

Rob Dugan, Mine Production Manager and Pat Quinn, RTL Supervisor – Labour Provision.

2. Are the mine roads being maintained to a standard?

In Part. WorkSafe observed evidence indicating that parts of the Traffic Control and Haul Roads Management Procedure (V9) are being used as a minimum standard, whilst other road standards appear to be based on personal criteria and judgement - set by the above mentioned personnel, rather than specific compliance to Section 2.2 and Section 2.5 of V9. (see additional comments ref Functional dot point 2.).

RTL contractors advised that their own resource (Civil Engineer - Mr. Shanahan) also provides additional design assistance when required)

3. How are mine road defects reported, actioned and closed out?

WorkSafe observed that the mine has several reporting mechanisms.

REPORTING and ACTIONING.

- Maximo - Raised work orders resulting from both written and oral reporting by line managers and employees.
- Incident Management System (IMS). Hazards and incidents are raised during meetings, phone calls, oral reports and written requests.
- Safe Work Instructions (SWIs) - i.e. During mine road extensions/rectifications.
- Daily Shift Meetings with Production team - Agenda set discussion for the last 24 hours, activities and safety issues are reviewed by those present including various line managers and engineering team.
- Shift Supervisor handover. WorkSafe did not observe this activity during verification.
- Informal phone calls by employees to Line managers – Road reports are given by production and maintenance employees during shift runs and immediately actioned by RTL Supervisor and employees.

CLOSE OUT REPORTS.

WorkSafe observed:

- IMS has close out mechanisms including tracking functions and 'follow-up' to closure.
- Work orders indicate close out where the work order numbers have termination time frames. Some Work orders are periodic or yearly/ongoing.
- Daily Production meeting agendas no longer cite the previous days 'raised road safety/condition issues'.

Functional:

1. Evidence that relevant mine personnel understand their responsibility for inspecting mine road conditions for maintenance.

Yes. WorkSafe observed evidence indicating that mine employees understand their responsibilities for inspecting road conditions.

WorkSafe enquiries with a random sample of employees indicated that employees understood their responsibilities for reporting road defects, however knowledge varied with regard to V9, particularly, the seasonal and environment conditions that can differ in the mine during the year and the controls associated with these conditions

2. Evidence that roads are being maintained to a standard. (V9 covers: Sect 2.5 Construction – material requirements, 2.6.1 Road widths, - single and double lane, 2.6.2 Grades). Evidence that

intersections are maintained to the standard layout and signage requirements as in V9 p. 30 for Mine Haul Roads and p31 for standard roads).

In Part. WorkSafe observed that whilst the road pavement and road dimensions are being maintained to the Section 2.6 of V9, the aspects of advanced hazard warning signage, speed zone transitions, and intersection design are not being adhered in accordance with Section 2.7 and 2.8 of V9.

In addition, the employer has failed to meet AS1742 (Manual of Uniform traffic control devices along haul and service roads) see CM 6 comments.

3. **Evidence that road safety berms are maintained to the standard (V9 Sect 2.7.1 Intersections – note the use of flagging/or berms at intersections (Is this adequate?) V9 Sect 2.9 Safety Berms and barriers and use of 450mm diameter water pipes as edge protection (is this based on a risk assessment?)**

In Part. WorkSafe observed that Road berms are generally well maintained, however berm design and the use of Armco rails/barriers have not been maintained in areas above travelling conveyors M860.

Risk assessments were not sighted/obtained/available regarding the use of flagging at intersections. Management informed that flagging is used as it is easier to relocate/remove when over dimensional (OD) traffic is present. The use of flagging appears to be based on convenience rather than assessment of risk.

Risk assessments were not sighted/obtained/available regarding the use of 450mm diameter water pipe as edge protection.

4. **Evidence of mine road defect reports, work orders created and maintenance carried out.**

Yes. WorkSafe observed records including defect and maintenance reports listed in the priority works list, work order summaries, IMS reports for April 2013 and an observation of the daily meeting on the 26/7/13.

Management reported that any immediate issues reported orally to the RTL Contractor Supervisor were/have been immediately acted upon. This system of response to road defects was not verified during the Verification.

Status (Yes/In Part/No - include explanation)

Implemented: In Part

Functional: In Part

Road standards varied throughout the site and appear to be based on personal criteria rather than specific compliance to sections 2.2 and Section 2.5 of V9. Risk assessments have not been conducted.

Opportunities for Improvement

Recommendations:

1. Provide training (and review of V9) to those responsible for designing, inspecting and maintaining the mine road conditions and furniture to ensure that road inspections and maintenance is performed according to the site standard (V9).
2. Conduct risk assessments on the use of flagging at intersections particularly the controlling of vehicle collisions
3. Conduct risk assessments on the use of 450mm diameter water pipe as edge protection.
4. Repair/maintain the Armco rails/barriers in the areas above travelling conveyors M860.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 1, 2, 3 & 4

6.2 Control Measure 2: Safety Inspection of Roads

MMH Control	Key areas of interest / Inspection Guidance
CM 2: Safety Inspection of Roads	**Reference Material:** V9 - Doc ID 42664 Traffic Control and Haul Road management Procedure V11 - Doc ID 44673 Procedure for Working at the Top and Toe of Batters V16 - MMH2 GDF Suez Hazelwood Major Mining Hazard 2 Mobile Plant Interactions Draft V2 June 2013. V19 - SC 0328 Procedure SWI Safety inspection of mine roads **Purpose of Control:** To ensure that regular SWI's are conducted according to schedule, on mine roads. **Performance Information:** ***Implemented:*** 1. How often are roads to be inspected for maintenance? (V9 Sect 2.11.1 has a list of inspection frequencies by various road users. Also, Sect 2.11.2 has a requirement for an annual audit). Who assesses the extent of any road damage repair and prioritises the repair work? (V9 Sect 2.11.1 states leading-hands responsibility). 2. What factors that may lead to road deterioration are considered when inspecting roads for safety? (V9 Sect 2.11.1). ***Functional:*** 1. Evidence the various nominated mine personnel are inspecting roads to the standard schedule (V9 Sect 2.11.1). 2. Evidence that Leading-hands/foremen/superintendent (p. 28 – V9) organise road repairs in a time frame appropriate with the level of risk associated with the hazard. 3. Evidence of road defect reports, work orders repair work completed and monitoring done.

Findings (Fact & Opinion)

Implemented:

1. **How often are roads to be inspected for maintenance? (V9 Sect 2.11.1 has a list of inspection frequencies by various road users. Also, Sect 2.11.2 has a requirement for an annual audit). Who assesses the extent of any road damage repair and prioritises the repair work? (V9 Sect 2.11.1 states leading-hands responsibility)**

   In Part. No documented evidence provided indicating that daily or monthly inspection of roads is being conducted as required by Section 2.11.1 (V9). Evidence indicates that either key employees observe road conditions (as per CM 1) during a drive-by/drive through or are as a result of oral reports by other employees. Priorities that require capital expenditure are referred to Civil Engineers for Work Orders.

   For new road construction, particularly permanent work, the appropriate Standard's design criteria is utilised by Supervisors. WorkSafe did not observe any actual road design drawings to indicate that they are constructed to a standard or specification. WorkSafe observed that when roads have deteriorated, no temporary road care plans, controls or furniture was being implemented.

Employees are encouraged to 'report as they see it' and implement controls accordingly i.e. barricading and temporary signage. However employee knowledge of the standards V9 varies as does the consistency of the 'temporary' controls.

There is also no site map guidance for Supervisors (or other employees) detailing road names, maintenance classification or traffic type suitability, traffic control and location.

2. **What factors that may lead to road deterioration are considered when inspecting roads for safety? (V9 Sect 2.11.1).**

In Part. Evidence in Section 2.11.1 sets criteria for evaluating poor road pavement conditions. This is a subjective set of specifications as employee knowledge of the standards V9 varies including section 2.11.1.

WorkSafe noted that there were no road pavement issues observed during the current fog and light rain activity. However evidence indicates that the road furniture conditions as documented in Section 2.8.4 are not being addressed and its evaluation is not occurring.

No dust issues were observed during the verification.

Functional:

1. **Evidence the various nominated mine personnel are inspecting roads to the standard schedule (V9 Sect 2.11.1).**

No documented evidence available indicating inspections are being carried out according to a schedule - either daily or monthly.

2. **Evidence that Leading-hands/foremen/superintendent (p. 28 – V9) organise road repairs in a time frame appropriate with the level of risk associated with the hazard.**

RTL Contractors informed that when directed, road repairs are addressed only to the extent of authorised expenditure. No risk assessments are conducted, if expenditure is not authorised, the matter is escalated and raised at the mine production meeting or through work order requests. See Mine Managers reports - July 2013. WorkSafe observed five reports for during July 2013.

It appears (through enquiries) that 'road repair' responsibilities are not limited to those listed in V9 (leading-hand/foreman/superintendent).

3. **Evidence of road defect reports, work orders repair work completed and monitoring done.**

Evidence was observed indicating that road issues are being reported and road maintenance activities are being recorded on priority works list, Work Order summaries, IMS reports (observed April 2013) and daily meeting agendas (observed 26/27th July 2013).

Status (Yes/In Part/No - include explanation)

Implemented: In Part

Functional: In Part

It appears that road condition monitoring is mainly reliant on employee observations and not on formal inspections by the contractors or the Q.A. manager (V18). This absence of documented assessments (SWIs) makes it impossible to analyse, track or audit the process.

Opportunities for Improvement

Recommendations:

1. Document/record the daily supervisor inspections of haul roads as per Traffic Control and Haul Roads Management Procedure (p. 28).
2. Document/record the monthly haul roads inspections as per Traffic Control and Haul Roads Management Procedure (p. 28).
3. Develop a road classification system for different road types which specifies construction and maintenance standards - to include in the road inspection process.
4. Conduct risk assessments where appropriate as per Traffic Control and Haul Roads Management Procedure (p. 28).
5. Create a mine road site map that documents the standards allowing for the location of defects, current traffic furniture, intersection types, underpasses/plant structures and traffic hazards/control arrangements that can be referenced on the SWIs when they are undertaken.
6. Consider the use of GPS applications to assist in tracking road maintenance and developments.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 5, 6, 7, 8, 9 & 10

6.3 Control Measure 3: Plant Pre-Starts

MMH Control	Key areas of interest / Inspection Guidance
CM 3: Plant Pre-Start Checks	**Reference Material:** V3 - Mobile Plant and Vehicle Hazard ID. V12 - Maintenance Requirements and Schedules for Mobile Plant (RTL) and Light Vehicles V15 - Doc ID 45098 Operate light vehicle MNCG1061A (Incorporating 4X4) Learning Guide V16 - MMH2 GDF Suez Hazelwood Major Mining Hazard 2 Mobile Plant Interactions Draft V2 June 2013 V20 - SC 0331 Plant pre-start checks **Purpose of Control:** To ensure that all mobile plant in the mine has pre-start checks. **Performance Information:** ***Implemented:*** 1. Is there a policy/standard that states the requirement for mobile plant pre-start checks? (V3 p3 responsibilities of Plant Operators) 2. Is there a standard checklist for mobile plant pre-start checks? (V3 p3 states the checklist is located on the cover of the plant/vehicle log book. Also, V15 p17 Section 2 has a pre-start checklist for light vehicles). 3. What action is taken if faults are found? (V3 p. 3 Plant Operators) ***Functional:*** 1. Evidence that employees conduct mobile plant pre-starts as per standard. (Interview random selection of employees and check the pre-start books from representative items of mobile plant). 2. Evidence that each item of plant has the required pre-start checklist on the cover of the plant/vehicle log book. 3. Evidence of defect reports, work orders raised and repair work completed for two vehicles – a light vehicle and a haul truck. 4. Evidence that auditing is conducted ensuring that pre-start inspections are being conducted.
Inspector Comments (Initial observations and enquiries)	
The following findings are based on discussions and evidence from personnel including: Sam Conway, Robert Dugan, Kevin Bott, John Janiw (GDF SUEZ), Ray Bickerton, Lincoln Herbert, Greg Cann (RTL) and Mark Trippit, Stuart Reeves (Bell Banne).	
Findings (Fact & Opinion)	

Implemented:

1. **Is there a policy/standard that states the requirement for mobile plant pre-start checks? (V3 p3 responsibilities of Plant Operators)**

   Yes. The scope of the GDF SUEZ Traffic Management Procedure version 2.0 (V8) states "The Traffic Management Procedure applies to all GDF SUEZ Hazelwood personnel contractors and visitors."

   Section 6.4.3 states that Driver responsibilities include:

   "Prior to using the vehicle for the first time each shift, the driver/operator is to conduct a pre-start inspection of the vehicle."

   WorkSafe observed that a contractor on site did not conduct pre-start inspections on their vehicles. Management instructed the contractor to ensure the pre-start requirements are implemented.

2. **Is there a standard checklist for mobile plant pre-start checks? (V3 p3 states the checklist is located on the cover of the plant/vehicle log book. Also, V15 p17 Section 2 has a pre-start checklist for light vehicles).**

   In Part. There are various checklists. Copies of two different Pre-start checklists (V27) have been included in this report, however there could be benefit from implementing a site standard checklist in line with the GDF SUEZ Traffic Management Procedure 6.4.3 (V8)

   Mobile Plant and Vehicle Hazard ID (V3) p. 3 states the checklist is located on the cover of the plant/vehicle log book. Log books could not be produced to verify this statement.

   Traffic Management Procedure (V8) p. 13 states that the driver/operator is required to sign onto the vehicle log book and note the kilometres. WorkSafe were unable to verify this.

3. **What action is taken if faults are found? (V3 p. 3 Plant Operators)**

   In Part. WorkSafe enquiries revealed that faults are generally reported through to site supervision and relevant action is taken depending on the fault and risk. E.g. Immediate risk / breakdowns are actioned ASAP. Other faults are recorded and programmed into the next regular service or outage.

   At the time of the Verification an instruction/procedure outlining this process was not available.

Functional:

1. **Evidence that employees conduct mobile plant pre-starts as per standard. (Interview random selection of employees and check the pre-start books from representative items of mobile plant).**

   A random selection of mobile equipment was inspected for evidence pre-start inspections have been conducted.

   This included:

   - RTL GRHP1 16H Grader. Pre-start inspection had been conducted as per requirements.
   - RTL RD1841 A30D Dump Truck. Pre-start inspection had been conducted as per requirements.
   - RTL RD2351 A30D Dump Truck. Pre-start inspection had been conducted as per requirements.
   - GDF SUEZ Nissan Patrol YSP 621. Pre-start inspection had been conducted as per requirements.
   - Bell Banne Toyota Hilux XKX 488. Pre-start inspection had not been carried out (see comments) below.

   WorkSafe identified that a contractor on site was not conducting prestart inspections on their vehicles.

WorkSafe observed email correspondence stating that Management had instructed the contractor to ensure the site pre start requirements were being followed.

2. **Evidence that each item of plant has the required pre-start checklist on the cover of the plant/vehicle log book.**

   Mobile plant and Vehicle Hazard ID (V3) p. 3 states that the checklist is located on the cover of the plant/vehicle log book. Log books could not be produced to verify this requirement.

3. **Evidence of defect reports, work orders raised and repair work completed for two vehicles – a light vehicle and a haul truck.**

   Mr. Kevin Bott provided evidence that light vehicles managed by GDF SUEZ are maintained by the dealer. Copy of service records and a completed pre-start inspection form for GDF SUEZ Nissan Patrol YSP 621 (V34) was obtained.

   Mr. Stuart Reeves provided evidence that vehicles managed by Belle Banne are maintained by Gippsland Automotive services. Copy of service records for Belle Banne Conveyor Services Mitsubishi Boiler Truck WDP 244 (V44) was obtained. Mr. Reeves informed that service intervals have not been defined however a system is currently being developed. V44 includes the process of developing a documented vehicle maintenance procedure.

   Management informed that vehicle servicing schedules are in line with the manufacturer's requirements; however they are unsure if this takes the mine environment into account when the servicing frequencies were developed.

   Due to the recent commencement of a new overburden prestrip contractor, mobile plant (haul truck) service /maintenance records were not readily available.

4. **Evidence that auditing is conducted ensuring that pre-start inspections are being conducted.**

   No evidence obtained during the Verification, management informed that regular audits (fresh eyes) are conducted where pre-starts inspections are verified. However, WorkSafe question the validity of these checks considering that their major maintenance contractor had not implemented this site requirement.

   Furthermore, in December 2010, WorkSafe noted that pre-start checks on equipment and plant were not being conducted. A Hazelwood safety 'Blimp' (no. 230) was issued to employees addressing this issue.

Status (Yes/In Part/No - include explanation)

Implemented: In Part

Functional: No

Contractor pre-starts not being conducted, auditing activities are not sufficient in identifying these issues.

Opportunities for Improvement

Recommendations:

1. Conduct specific auditing to ensure all employees including contractors conduct pre-start inspections.
2. Ensure all mobile plant and light vehicles log books and that the pre-start checklists are available.
3. Review vehicle servicing schedules/frequencies in line with their operating environment.
4. Review all contractor vehicle maintenance procedures to ensure they comply with site policy.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 11, 12, 13 & 14

6.4 Control Measure 4: Vehicle 'Fit for Purpose'

MMH Control	Key areas of interest / Inspection Guidance
CM 4: Vehicle 'Fit for Purpose'	**Reference Material:** V3 - Mobile Plant and Vehicle Hazard ID. V8 - Doc ID 48590 Traffic Management Procedure V9 - Doc ID 42664 Traffic Control and Haul Road management Procedure V12 - Maintenance Requirements and Schedules for Mobile Plant (RTL) and Light Vehicles V17 - MMH5 GDF Suez Hazelwood Major Mining Hazard 5 Vehicle Interactions Draft V2 June 2013 V21 - SC 0340 Design/ Fit for purpose vehicle (light vehicle/forklifts/scissor lifts/bobcats/fire trucks/trailers) **Purpose of Control:** To ensure that Mine Vehicles, including trailers/tanks are fit-for purpose. **Performance Information:** ***Implemented:*** 1. Do light vehicles have to comply with a standard - for use in the mine? 2. Are light vehicles assessed for mine road use suitability? 3. Are mine vehicles / mobile plant required to have flashing lights? 4. Are vehicles required to have two way radios installed? 5. Does the mine have a mobile plant register? (V3 p. 3 states that the Fleet Manager maintains a register of Mobile Plant and indicates on the register any regulatory requirements). ***Functional:*** 1. Evidence there is a light vehicle standard that covers all the 'fit for purpose' requirements for safety. 2. Evidence that light vehicles have been tested for site use. suitability (according to V21 this includes feedback from drivers and operators) 3. Evidence that vehicles requiring flashing lights have these installed and operate as required. 4. Evidence that vehicles requiring two way radios have these fitted and are functional. 5. Evidence of the Mobile Plant register is maintained and up to date.
Inspector Comments (Initial observations and enquiries)	
The following findings are based on discussions and evidence from personnel including: Sam Conway, Robert Dugan, Garry Wilkinson, and Kevin Bott (GDF SUEZ) and Mark Trippit, and Stuart Reeves (Belle Banne).	

Findings (Fact & Opinion)

Implemented:

1. **Do light vehicles have to comply with a standard - for use in the mine?**

   In Part. SC 0340 Design/ Fit for purpose vehicle (V21) states mine vehicles must be Australian Design Rules (ADR) compliant for vehicle safety.

   This does not cover mine conditions and any road/driving hazards particular to site.

   At the time of the verification a vehicle standard (V28) was provided, however this is not an implemented site policy.

2. **Are light vehicles assessed for mine road use suitability?**

   In Part. An element of GDF SUEZ Mine Fire Service Policy (V26) requires mine vehicles to be fitted with a modified exhaust system and be driven through a slurry pit. This test is for fire prevention not associated with road use suitability.

   A vehicle test regime has been previously conducted; (V35) was obtained as evidence – i.e. spreadsheets used for the process. The process appears to be ad-hoc.

3. **Are mine vehicles / mobile plant required to have flashing lights?**

   Yes. Traffic Management Procedure (V8) p.15 states vehicles operating below grass level and any other nominated areas require flashing lights.

   Also, Traffic Control and Haul Roads Management Procedure (V9) Sect 2.3.1 states flashing light requirements.

4. **Are vehicles required to have two way radios installed?**

   In Part. Traffic Control and Haul Roads Management Procedure (V9) Sect 2.3.1 states it is 'desirable' but not compulsory for a vehicle (entering the mine) to be fitted with a two way radio.

5. **Does the mine have a mobile plant register? (V3 p. 3 states that the Fleet Manager maintains a register of Mobile Plant and indicates on the register any regulatory requirements)**

   No. A mobile plant register was not available / provided at the time of the verification.

Functional:

1. **Evidence there is a light vehicle standard that covers all the 'fit for purpose' requirements for safety.**

   No. At the time of the verification a vehicle standard (V28) was provided, however this is not a site policy.

2. **Evidence that light vehicles have been tested for site use. suitability (according to V21 this includes feedback from drivers and operators)**

   In Part. A light vehicle test assessment fleet review has been undertaken (V33), however as new vehicles come on to the market the data becomes dated quickly. This is an ongoing process.

   There is no standard test criteria associated with this process.

3. **Evidence that vehicles requiring flashing lights have these installed and operate as required.**

   Yes. The vehicles observed by WorkSafe within the mine had operating flashing lights.

4. **Evidence that vehicles requiring two way radios have these fitted and are functional.**

   In Part. WorkSafe observed random selection of site vehicles, all had two way radios fitted, however Traffic

Control and Haul Roads Management Procedure (V9) Sect 2.3.1 states it is 'desirable' but not compulsory for a vehicle to be fitted with a two way radio.

WorkSafe was informed that the two way radio system is currently under review and private channels have been purchased as part of the process.

5. Evidence of the Mobile Plant register is maintained and up to date.

No. A Mobile plant register was not provided at the time of this verification.

Belle Banne Conveyor Services are developing a register for their site vehicles; an extract from this register (V44) was provided to WorkSafe at the time of this verification.

Status (Yes/In Part/No - include explanation)

Implemented: In Part

Functional: No

Site vehicle requirements have not been determined; a plant register as described in site documents does not exist.

Opportunities for Improvement

Recommendations:

1. Develop site vehicle standards for all vehicles that are required to enter the mine.
2. Ensure Two Way radio requirements are clear in the site vehicle standard.
3. Develop a plant register.
4. Develop a standard test criterion for the light vehicle fleet review process.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 15, 16, 17, & 18

6.5 Control Measure 5: Competent and/or Licensed Operators

MMH Control	Key areas of interest / Inspection Guidance
CM 5: Competent and/or Licensed Operators	**Reference Material:** V8 - Doc ID 48590 Traffic Management Procedure V9 - Doc ID 42664 Traffic Control and Haul Road management Procedure V15 - Doc ID 45098 Operate light vehicle MNCG1061A (Incorporating 4X4) Learning Guide V17 - MMH5 GDF Suez Hazelwood Major Mining Hazard 5 Vehicle Interactions Draft V2 V22 - SC 0341 Competent and/or licensed operators. **Purpose of Control (as stated by WSV):** To ensure that all drivers of mine vehicles hold a current Victorian Driver's Licence (where applicable) and that the operator of the mine has ensured that employees are competent to drive vehicles within the mine. **Performance Information:** ***Implemented:*** 1. Has the operator of the mine implemented the site requirements (as documented in V15 Sect 1.2 and 1.4) for driver licensing i.e. drivers hold a current Victorian Driver's Licence? 2. Are driver's licenses sighted (originals) and copies kept/available for inspection? 3. How are driver's licenses records maintained as current i.e. they have not expired or cancelled/suspended due to infringements? (V15 Sect 1.3 states that it is the employee's responsibility to report disqualification of their licence) – is this practiced? 4. How are drivers trained in relation to mine site requirements and traffic rules including V9 p. 33 attachment 1, Haul Road Rules? 5. What are the training requirements to operate a 4X4 vehicle? (ref V15 Sect 1.5) ***Functional:*** 1. Evidence that records of driver's licences are kept and maintained as current for all employees including contractors. 2. Evidence that drivers have taken responsibility to notify of any changes to the status of the licence. 3. Evidence that employees are aware of and understand the Haul Road Rules as defined in V9 Traffic Management Procedure. 4. Evidence that employees have received 4X4 training.

Findings (Fact & Opinion)

Implemented:

1. **Has the operator of the mine implemented the site requirements (as documented in V15 Sect 1.2 and 1.4) for driver licensing i.e. drivers hold a current Victorian Driver's Licence?**

Yes. WorkSafe observed (on computer), a database 'Chris' that captures all mine employee driver licences. One anomaly observed – an employee's licence details had not been entered into the system, management stated that they had sighted the employee's licence – no copies were kept within the employee's file.

2. **Are driver's licenses sighted (originals) and copies kept/available for inspection?**

   Yes. See comments above. WorkSafe sighted a random sample of employee records and reconciled with the data base.

3. **How are driver's licenses records maintained as current i.e. they have not expired or cancelled/suspended due to infringements? (V15 Sect 1.3 states that it is the employee's responsibility to report disqualification of their licence) – is this practiced?**

   In Part. Employee driver licences are maintained via the above mentioned data base. The data base 'flags' expired licences, a monthly report is generated and notification is sent to the employee's supervisor. WorkSafe observed a random sample of previous monthly reports (V51) and noted that an employee's licence had expired in January 2012 and no follow-up had taken place. WorkSafe was informed that the employee is still driving on site.

   Following WorkSafe's request, the employee provided a current Victorian driver's licence.

   In another instance, an employee's driver licence had expired in April 2013.

   There appears to be no mechanism for follow-up if an employee 'chooses' not to provide a current driver's licence to his supervisor.

4. **How are drivers trained in relation to mine site requirements and traffic rules including V9 p. 33 attachment 1, Haul Road Rules?**

   In Part. Management informed that basic instruction is provided during the initial site induction including speed limits for road and coal surfaces, compliance with site road signage and general traffic management safety precautions; this was verified in conversation with employees.

   Management stated that V9 – Traffic Control and Haul Roads Management Procedure has been provided during past 'tool box' meetings, however this could not be confirmed (no records available). Employees could not recall when this instruction was provided.

   Furthermore, management could not confirm whether contractors have been provided with this information (See CM 8 comments).

   Upon review of documents V8 – Traffic Management Procedure (Doc. I.D. 48590) and V15 – Training package MNC 04 – Operate light vehicle (Doc. I.D. 45098), WorkSafe observed inconsistencies relating to parking distances from operational plant. V8 (p 12) states 30 metres, V15 (p 19) states 40 metres.

5. **What are the training requirements to operate a 4X4 vehicle? (ref V15 Sect 1.5)**

   Training requirements as stated within V15 – Operate Light Vehicle (p. 14) – All employees who expect to operate and drive light vehicles will have the opportunity to attend a driver skills training course and pass a competency based assessment measuring driver skills and attitudes, as indicated on the Training Plan. Where refresher training is needed, this will be identified by the Training Committee.

   The Training Plan as described above does not detail any scheduled 4X4 training for 2013. See SMS 2 comments.

   WorkSafe could not find within the documentation provided (or verify) that 4X4 training is a mandatory requirement prior to driving within the mine.

   V9 (p. 33) states that 'No person is permitted to drive or operate on the mine site without the appropriate authorisation'.

   Management could not provide WorkSafe with a clear understanding or definition of 'appropriate

authorisation'.

Functional:

1. **Evidence that records of driver's licences are kept and maintained as current for all employees including contractors.**

   In Part. WorkSafe observed (on computer), a data base that captures all mine employee driver licences.

   WorkSafe observed past monthly reports and noted that an employee's licence had expired in January 2012 and another in April 2013 and no follow-up had taken place. WorkSafe was informed that the employees are still driving on site.

   There appears to be no mechanism for follow-up if an employee 'chooses' not to provide a current driver's licence to his supervisor.

   See CM 8 comments for contractor driving licences – record keeping and auditing.

2. **Evidence that drivers have taken responsibility to notify of any changes to the status of the licence.**

   In Part. It appears that in most instances employees have provided current driver's licences when prompted by HR personnel (as per the data base). However, see comments above.

3. **Evidence that employees are aware of and understand the Haul Road Rules as defined in V9 Traffic Management Procedure.**

   Yes. Enquiries with a random sample of employees indicate knowledge of basic requirements including but not limited to:

   - Seat belt requirements
   - Windrow requirements (not to drive on etc...)
   - Max speed limits for coal and other surfaces
   - Giving right of way to tracked earth moving equipment, haul trucks and mobile plant.

4. **Evidence that employees have received 4X4 training.**

   Yes. Management provided 4X4 training and light vehicle recovery reports (V50) as evidence employees have received training in this area. WorkSafe observed a random sample of completed assessments.

Status (Yes/In Part/No - include explanation)

Implemented: In Part

Functional: In Part

Opportunities for Improvement

Recommendations:

1. Hazelwood to clearly define 'appropriate authorisation' and document the mandatory requirements for driving within the mine i.e. current Victorian Driver's licence, 4X4 training and light vehicle recovery, familiarisation with related / relevant procedures etc...
2. Hazelwood to implement a system that prevents an employee from driving within the mine if the employee's driver licence has expired. A number of mechanisms are available including cancellation of the site access card, random auditing and follow-up by senior management if an employee 'chooses' not to provide a current driver's licence to his supervisor.

3. Hazelwood to review documents V8 – Traffic Management Procedure (Doc. I.D. 48590), V15 – Training package MNC 04 – Operate light vehicle (Doc. I.D. 45098) and V53 site induction. WorkSafe observed inconsistencies relating to parking distances from operational plant. V8 (p 12) and V53 (p 14) states 30 metres, V15 (p 19) states 40 metres.
4. Hazelwood to provide specific driver 'refresher' tool box topics including (but not limited to):
    - Traffic Management Procedure (Doc. I.D. 48590);
    - Other related procedures as listed within the Traffic Management Procedure (p 5); and
    - Traffic Control and Haul Roads Management Procedure (Doc. I.D. 42664)

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 19, 20, 21, & 22

6.6 Control Measure 6: Signage (Road/Speed Limits etc)

MMH Control	Key areas of interest / Inspection Guidance
CM 6: Signage (Road/Speed Limits etc)	**Reference Material:** V9 - Doc ID 42664 Traffic Control and Haul Road management Procedure V10 - Doc ID 42637 Traffic Control Procedure for Temporary Works on or Near Roadways V17 - MMH5 GDF Suez Hazelwood Major Mining Hazard 5 Vehicle Interactions Draft V2 V23 - SC 0166 Signage (Speed Limits etc) **Purpose of Control:** Adequate speed limit and safety signs displayed on site **Performance Information:** ***Implemented:*** 1. Does the site have specific standards for road signage? (V9 Sect 2.8.1 details the type of road signs and the placing of these). 2. Are requirements for guideposts (delineators) defined? (V9 Sect 2.8.2) 3. Is there a guideline for the placing of road signs? (V9 Sect 2.8.3 p. 24) 4. Does the standard include a process for maintaining road signs including cleaning? ***Functional:*** 1. Evidence that road signs are placed along roads in accordance with the site standard. Check signage requirements at intersections as per CM1 Road Maintenance Program Functional Question 2. 2. Evidence that guide posts are located along the side of roads and are constructed as per V9 Section 2.8.2 and are at a maximum spacing of 60m along any straight section of road. 3. Evidence (site observations) adequate/applicable signage installed. 4. Evidence that road signs are maintained and clean.

Findings (Fact & Opinion)

Implemented:

1. **Does the site have specific standards for road signage? (V9 Sect 2.8.1 details the type of road signs and the placing of these).**

   Yes. Evidence observed indicates that the employer provides guidance for its site road furniture contained in V9 also incorporating AS1742 Standard and the Thiess Guide on roads within Mines. The employer applies these standards to all traffic control devices.

2. **Are requirements for guideposts (delineators) defined? (V9 Sect 2.8.2)**

   Yes. Evidence observed through procedure V9 Section 2.8.2, provides guidance information for delineators and the installation specifications. It also aligns with AS1742.2 and that table 4 nominates spacing locations.

3. **Is there a guideline for the placing of road signs? (V9 Sect 2.8.3 p. 24)**

   Yes. The Employer has guidance in its Traffic Control and Haul Road Management procedure that indicates required location of traffic control furniture. Evidence along roads indicates that this is being adhered to.

4. **Does the standard include a process for maintaining road signs including cleaning?**

   Yes. Section 2.8.4 V9 requires that cleaning maintenance of signage is undertaken.

Functional:

1. **Evidence that road signs are placed along roads in accordance with the site standard. Check signage requirements at intersections as per CM1 Road Maintenance Program Functional Question 2.**

   WorkSafe observations taken in relation to the Traffic Control and Haul Road Management procedure.

   A number of non compliant (with the site requirements) observations were noted/observed with Section 2.8.1 to 2.8.3.

   - Speed reduction or speed transition zones require speed signs to be placed both sides of haul roads to account for left hand drive plant driver visibility.
   - Light Vehicle only access signs are not in place where appropriate
   - Low clearance limits not properly constructed and located for underpasses/conveyor structures/tunnels and not available for advance hazard warning.
   - Current mine installation practices relating to centre line construction i.e. concrete barriers do not reflect major intersection drawings. Use of flagging is not best practice and it does not engineer behaviour as does a low wall bund island or a removable concrete/water barrier.
   - Y Intersection design is installed at M860 conveyor overpass location on its south side with no apparent assessment or standards criteria in mind. Additionally, the main bitumen road intersection near the maintenance buildings is not designed or constructed to provide clear line of sight. Give way and stop signs are installed at intersections without clearly defined road markings.
   - Traffic Lights with the "prepare to stop on red signal" signs are not to class 1 standards and not facing within 5 degrees of approaching traffic. Some speed and stop signs are faded along bitumen roads leading to the power station.
   - Chevron alignment markers are not in place for all turning bends and curves.

2. **Evidence that guide posts are located along the side of roads and are constructed as per V9 Section 2.8.2 and are at a maximum spacing of 60m along any straight section of road.**

   WorkSafe observed during verification that guide post delineators installations complies with Section 2.8.2 of the site standards, in respect to row of longitudinal spacing and along curved roads.

   Some delineators were observed placed further than four metres from the road shoulder. Additionally, a long line of delineators were missing along new areas due to recent repositioning of large mining equipment. No temporary road edge indicators or hazard signs measures were in put in lieu of damaged delineators.

   The use of delineators should not be used in place of berms, but rather to compliment the delineation and separation of civil structures such as deep table drains along curved road sections.

3. **Evidence (site observations) adequate/applicable signage installed.**

   Advance road signage design dictates that warning signs must be at least 75-100m from identified road hazard; this has been poorly maintained/managed at the workplace.

WorkSafe observed that there was no system to monitor road furniture as required by Section 2.8.4.

It was also observed that overhead hazards not being clearly defined and controlled in areas leading to the under areas/underpasses designed for traffic.

Advance hazard signage indicating steep grades, intersections, low height clearances and culverts are not being installed.

4. **Evidence that road signs are maintained and clean.**

WorkSafe observed during verification that this is not being undertaken and that responsible persons or resources have been assigned and allocated for this task. No documented evidence was presented indicating that the task had been undertaken previously. Class 1 Signage requires it to be retro-reflective for low light conditions and the current lack of maintenance is not assisting in this requirement.

Status (Yes/In Part/No - include explanation)

Implemented: Yes

Functional: No

Advance hazard signage has not been installed. Regular maintenance is not being carried out.

Additional comments

WorkSafe issued two improvement notices in relation to the above mentioned observations.

V00048403551L/111-01 - Failing to maintain regulatory road signage within mine; and

V00048403551L/111-02 - Inadequate advanced height restriction warning systems for vehicle and plant work under road tunnels and conveyors within the mine.

Opportunities for Improvement

Recommendations:

1. Ensure that the road signage/furniture complies with the site standard
2. Audit the site's haul roads to ensure that applicable signage has been installed and is compliant with the site standard.
3. Install advance hazard signage where applicable (as per Improvement Notice V00048403551L/111-02.
4. Assign responsible persons for regular inspections and maintenance.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 23, 24, 25, & 26

6.7 Control Measure 7: Contractor Management Process

MMH Control	Key areas of interest / Inspection Guidance
CM 7: Contractor Management Process (Driver licences and training)	**Reference Material:** V16 - MMH2 GDF Suez Hazelwood Major Mining Hazard 2 Mobile Plant Interactions Draft version2 June 2013 V25 - SC 0124 Contractor Management Process. **Purpose of Control (as stated by the operator):** To ensure that all contractors and service providers in the mine, drive safely, according to the conditions and obey all IPR driving rules. IRP-GDF SUEZ has in place appropriate safety management system/procedures for driving in the mine. **Performance Information:** ***Implemented:*** 1. Has the operator of the mine implemented the site requirements (as documented in V15 Sect 1.2 and 1.4) for driver licensing i.e. contractors who drive on the mine site hold a current Victorian Driver's Licence? 2. Are contractor driver's licenses sighted (originals) and copies kept/available for inspection? 3. How are contractor driver's licenses records maintained as current i.e. they have not expired or cancelled/suspended due to infringements? (V15 Sect 1.3 states that it is the employee's responsibility to report disqualification of their licence) – is this practiced? 4. How are contractor drivers trained in relation to mine site requirements and traffic rules including V9 p. 33 attachment 1, Haul Road Rules? ***Functional:*** 1. Evidence that records of driver's licences are kept and maintained as current for site contractors. 2. Evidence that drivers have taken responsibility to notify of any changes to the status of the licence. 3. Evidence that contractors are aware of and understand the Haul Road Rules as defined in V9 Traffic Management Procedure. 4. Evidence that contractors have received 4X4 training.

Inspector Comments (Initial observations and enquiries)

The primary focus for this control measure was on the operator's infrequently used and itinerant contractors e.g. DrillTec.

Findings (Fact & Opinion)

Implemented:

1. Has the operator of the mine implemented the site requirements (as documented in V15 Sect

1.2 and 1.4) for driver licensing i.e. contractors who drive on the mine site hold a current Victorian Driver's Licence?

No. WorkSafe was unable to verify this requirement; no records were available for inspection. (See additional comments SMS 1).

2. **Are contractor driver's licenses sighted (originals) and copies kept/available for inspection?**

   No. (See comments above).

3. **How are contractor driver's licenses records maintained as current i.e. they have not expired or cancelled/suspended due to infringements? (V15 Sect 1.3 states that it is the employee's responsibility to report disqualification of their licence) – is this practiced?**

   No. WorkSafe was unable to verify.

4. **How are contractor drivers trained in relation to mine site requirements and traffic rules including V9 p. 33 attachment 1, Haul Road Rules?**

   WorkSafe was unable to verify as contractor training records are not kept/available. It appears that contractors do not receive training/instruction in this area.

Functional:

1. **Evidence that records of driver's licences are kept and maintained as current for site contractors.**

   No, the bulk of enquiries indicated that the operator does not keep records or audit contractor driver licences. However in one instance, the responsible officer for Geohart was able to provide evidence that the contractors (under his management) have current licence.

2. **Evidence that drivers have taken responsibility to notify of any changes to the status of the licence.**

   No evidence observed, provided or kept on record.

3. **Evidence that contractors are aware of and understand the Haul Road Rules as defined in V9 Traffic Management Procedure.**

   No evidence observed, provided or kept on record.

4. **Evidence that contractors have received 4X4 training.**

   No evidence observed, provided or kept on record.

Status (Yes/In Part/No - include explanation)

Implemented: No

Functional: No

Management were unable to provide evidence of contractor driver licences and/or driver competencies for infrequently used/itinerant contractors.

Additional Comments

WorkSafe issued an Improvement Notice relating to the management of site contractors, under Regulation 5.3.21(2) of the Occupational Health and Safety Regulations 2007. See comments SMS 1 – Contractor Management.

Improvements to this control measure including the recommendations listed below should also be captured within the SMS element – Contractor Management.

Recommendations

In addition to the compliance issue as documented under SMS 1 – Contractor Management, WorkSafe recommends that AUSTRALIAN POWER PARTNERS B V & OTHERS:

1. Conduct a licencing audit of all site contractors (who are required to drive within the mine), ensuring that they have current driving licences and that records are kept and maintained.
2. Conduct the relevant site specific driver training for those contractors who are required to drive within the mine, including (but not limited to):
    - Traffic Management Procedure (Doc. I.D. 48590);
    - Other related procedures as listed within the Traffic Management Procedure (p 5).
    - Traffic Control and Haul Roads Management Procedure (Doc. I.D. 42664); and
    - Operate Light Vehicle Manual – incorporating 4X4 training (Doc. I.D. 45098).

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions have been set refer WorkSafe 2013 Verification Report Action Plan 27 & 28

6.8 SMS Element 1: Contractor Management

SMS Element	Key areas of interest / Inspection Guidance
SMS 1: Contractor Management	**Reference Material:** • V5 SS Purchasing Procedure – DocID 48274. • V6 SMS Evaluation of Contractors – DocID 3210. • V25 System Control Description – Contractor Management Process. • Occupational Health and Safety Regulations 2007, r. 5.3.21 Safety Management System. **Focus:** Itinerant and infrequently used contractors. **Purpose as stated by WSV** A system for managing the Health and Safety of Contractors exists and is incorporated into the operator's SMS. **Operating Performance Conditions/Parameters/Criteria:** The Occupational Health and Safety Regulations 2007, r.5.3.21(2) Safety Management System - requires that the operator must use the Safety Management System as the primary means of ensuring the safe operation of the mine. **Implemented:** 1. Does the Operator's SMS include a system/process for engaging contractors? 2. Are roles and responsibilities for those employed to manage site contractors (Contract Managers and Responsible Officers) clearly defined (p. 8-9 V5 SS Purchasing Procedure – DocID 48274)? Has training been provided to ROs and CMs? 3. Can Contract Managers and Responsible Officers explain their roles and responsibilities – do they have an understanding of their roles/responsibilities – have they received training? How does the CM/RO monitor contractor activities i.e. Frequencies (onsite presence) – contractors that 'come and go' infrequently e.g. itinerant contractors – how do they know when they are 'onsite'? 4. Are contract meetings being held/conducted as per documented process (p. 45-55 V5 SS Purchasing Procedure – DocID 48274)? – obtain random sample minutes. **Functional:** 1. Evidence/examples that the contractor(s) have completed, and that the operator (Hazelwood) has obtained and evaluated the completed forms re: SMS-1 (p. 8 -10) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples. 2. Have Contract Managers and Responsible Officers been assigned for those examples provided in 'Functional' dot point 1). 3. Evidence/examples that the contractor(s) have completed, and that the operator (Hazelwood) has obtained and reviewed the completed forms re: SMS-2 (p. 11 -12) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples. 4. Evidence/examples that the operator (Hazelwood) performs regular site Inspection audits of contractor(s) activities, and that the operator has completed forms re: SMS-3

	(p. 13 -14) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples. 5. Have frequencies been determined/do schedules exist for site Inspection audits of contractor(s) activities – are inspections being carried out according to the schedule? 6. Does the operator conduct regular reviews of the contractor management system including auditing activities re: Evaluation of Contractors – completion of attached forms – Obtain evidence?

Findings (Fact & Opinion)

Implemented:

1. **Does the Operator's SMS include a system/process for engaging contractors?**

   Yes. V5 SS Purchasing Procedure – Doc. I.D. 48274 and V6 SMS Evaluation of Contractors – Doc. I.D. 3210, details the processes for engaging contractors.

2. **Are roles and responsibilities for those employed to manage site contractors (Contract Managers and Responsible Officers) clearly defined (p. 8-9 V5 SS Purchasing Procedure – DocID 48274)? Has training been provided to ROs and CMs?**

   In Part. Responsibilities are documented generically in V5 – Purchasing Procedure, however Evaluation of Contractors procedure (V6) is not referenced in V5. The responsibilities of Contract Managers (CMs) and Responsible Officers (ROs) regarding the completion of the evaluation documents SMS-1 and SMS-2 are not clearly stated in either document the exception being document SMS-3.

   No training has been provided to ROs and CMs re: responsibilities and accountabilities.

3. **Can Contract Managers and Responsible Officers explain their roles and responsibilities – do they have an understanding of their roles/responsibilities – have they received training? How does the CM/RO monitor contractor activities i.e. Frequencies (onsite presence) – contractors that 'come and go' infrequently e.g. itinerant contractors – how do they know when they are 'onsite'?**

   No. Discussions and enquiries with majority CMs and ROs revealed lack of knowledge of responsibilities and accountabilities as documented within V5 and V6.

   Management stated that they have recently conducted a review of the management of contractors and noted that specific training is required with regard to responsibilities of assigned ROs, WorkSafe noted that this training should also be extended to CMs.

   On site contractor activities are managed sporadically with varying degrees of compliance with the site system. One RO was able to provide detailed auditing activities and oversight processes with regard to the contractors under his management; however others were unable to provide evidence of compliance with the site processes and system.

4. **Are contract meetings being held/conducted as per documented process (p. 45-55 V5 SS Purchasing Procedure – DocID 48274)? – obtain random sample minutes.**

   No. The bulk of enquiries revealed that these meetings are not being conducted. WorkSafe observed that one RO was able to provide details and evidence that the contractors under his management are conducting meetings as documented on p. 55 of V5.

Functional:

1. **Evidence/examples that the contractor(s) have completed, and that the operator**

(Hazelwood) has obtained and evaluated the completed forms re: SMS-1 (p. 8 -10) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples.

No evidence available confirming that the form commonly known as SMS-1 is being completed, forwarded to the Contracts Manager, evaluated or reviewed.

2. **Have Contract Managers and Responsible Officers been assigned for those examples provided in 'Functional' dot point 1).**

   In Part. ROs have been assigned, however it is unclear from the obtained list (V54) who they are. WorkSafe requested documentation that included a list a contractors engaged by Hazelwood within the last 18 months and their responsible officers.

   During enquiries, irregularities appeared within the list and assigned ROs, management later informed WorkSafe that the list included contractors that had been engaged prior to 2008 and prior to the revision of V6 SMS Evaluation of Contractors – Doc. I.D. 3210. As a result, some listed ROs are no longer on site.

   In some instances management were unsure if the listed contractors were still engaged and performing work on the site.

   Furthermore, an assigned RO had resigned from his position and his RO duties were allocated to another employee. The new RO could not provide evidence of oversight activities with regard to the contractors under his management believing that the contractors had not been on site for over three years. Upon review of the work carried out by the contractor it was noted that the contractor had conducted work on site within the last two years.

3. **Evidence/examples that the contractor(s) have completed, and that the operator (Hazelwood) has obtained and reviewed the completed forms re: SMS-2 (p. 11 -12) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples.**

   No evidence available confirming that the form commonly known as SMS-2 is being completed, forwarded to the Contracts Manager, evaluated or reviewed.

4. **Evidence/examples that the operator (Hazelwood) performs regular site Inspection audits of contractor(s) activities, and that the operator has completed forms re: SMS-3 (p. 13 -14) of V6 SMS Evaluation of Contractors – DocID 3210, obtain examples.**

   In Part. Only in some instances. Evidence was observed that the form commonly known as SMS-3 is being completed. V36 (completed SMS-3 form) has been completed by an employee who is not the assigned RO.

5. **Have frequencies been determined/do schedules exist for site Inspection audits of contractor(s) activities – are inspections being carried out according to the schedule?**

   No. Schedules do not exist, inspections are being carried out on an adhoc basis.

6. **Does the operator conduct regular reviews of the contractor management system including auditing activities re: Evaluation of Contractors – completion of attached forms – Obtain evidence?**

   No. Auditing is not carried out ensuring that the relevant evaluation forms as documented above are being completed.

Status (Yes/In Part/No - include explanation)

Implemented : In Part

Functional : No

Additional Comments
WorkSafe issued an Improvement Notice under Regulation 5.3.21(2) of the Occupational Health and Safety Regulations 2007, requiring the operator of the mine to use their Safety Management System as the primary means of ensuring the safe operation of the mine. Furthermore Regulation 5.3.21(3)(f) of the Occupational Health and Safety Regulations 2007 requires the operator's Safety Management System (SMS) to set out the systems, procedures and other risk control measures by means of which risks to health or safety associated with mining hazards are to be controlled. WorkSafe observed that the operator's SMS contains a process for Contractor Evaluation (Doc. I.D. 3210) that is to be followed to ensure that contractors have safe systems of work in place to meet or exceed the practices and policies required by the operator of the mine. WorkSafe was informed by management that the process for evaluating site contractors within the mine is not being followed. Furthermore management was informed that the operator's infrequently used/itinerant contractors have not been evaluated as per the processes documented within the document titled 'SMS Evaluation of Contractors' (Doc. I.D 3210). In addition, Management could not provide evidence that the contractors (as selected by WorkSafe) have been deemed competent to perform the tasks allocated to them or evidence that the contractors have the required licences and relevant training to drive on site. These requirements would be identified during the contractor evaluation process as documented within SMS Evaluation of Contractors (Doc. I.D 3210) document. Compliance with the Improvement Notice V01017400348L/111-02 may be achieved by adopting the recommendations listed below.
Recommendations
Hazelwood to: 1. Review/revise the document titled 'SMS Evaluation of Contractors' (Doc. I.D 3210); 2. Document responsibilities of Contract Managers, Responsible Officers, the Health and Safety Manager and the contractor; 3. Provide training to those that have the allocated responsibilities; 4. Ensure that the appropriate forms are completed, submitted and reviewed as per SMS Evaluation of Contractors' (Doc. I.D 3210); 5. Maintain records for auditing and inspection purposes; and 6. Schedule regular audits of the Contractor Management/evaluation process.
Comments from the Operator on the Findings and Required Actions
We agree with the findings and actions will be completed as per Improvement Notice V01017400348L/111-02

6.9 SMS Element 2: Training – Mobile Plant/Plant Operations

SMS Element	Key areas of interest / Inspection Guidance

SMS 2: Training	**Reference Material:** • V14 Annual Training Plan Procedure – DocID 41515. • Occupational Health and Safety Act 2004, s.21(1) and s.21(2)(e) – Duties of Employers to Employees – Provision of Training. • Occupational Health and Safety Regulations 2007, r.5.3.21 Safety Management System. **Focus:** Primary focus on the training system with particular attention on mobile plant/plant operations – Dozers, Haul Trucks, Water Carts, Graders, Light Vehicles (4WD), Fork Lifts, EWPs, Cranes etc... **Purpose as stated by WSV** A system exists within the operator's SMS that ensures employees have appropriate qualifications, licences and receive relevant training to safely operate mobile plant within the mine. **Operating Performance Conditions/Parameters/Criteria:** The Occupational Health and Safety Act 2004 s.21(1) requires the employer to, so far as is reasonably practicable, provide and maintain for employees of the employer a working environment that is safe and without risks to health and s.21(2)(e), without limiting sub-section (1), an employer contravenes that sub-section if the employer fails to provide such information, instruction, training or supervision to employees of the employer as is necessary to enable those persons to perform their work in a way that is safe and without risks to health. The Occupational Health and Safety Regulations 2007, r.5.3.21(2) Safety Management System - requires that the operator must use the Safety Management System as the primary means of ensuring the safe operation of the mine. **Implemented:** 1. Does the Operator have a system for ensuring that employees are 'deemed' competent to safely operate mobile plant? 2. Has the Operator identified the relevant training needs/requirements for employees to safely operate mobile plant? 3. V14 Annual Training Plan Procedure – DocID 41515 documents the site requirement to develop an annual training plan – Has the Operator developed an annual training plan for its employees? – Obtain sample copy. 4. Have resources been allocated including budgets and personnel to execute the annual training plan? 5. Has the Operator assigned specific personnel (as documented within V14 Annual Training Plan Procedure – DocID 41515) to develop and execute the annual training plan? Are roles/responsibilities of personnel utilised to develop and execute the annual training plan clearly defined and understood? 6. Are employees training records/licences and qualifications available, maintained and reviewed on a regular basis? – Observe and review random sample.

	Functional: 1. Evidence that the annual training plan has been developed according to the Annual Training Plan Procedure – DocID 41515 (V14). 2. Evidence that training is being conducted according to the plan as described within the Annual Training Plan Procedure – DocID 41515 (V14). 3. Is training conducted by a suitably qualified person and is the training regularly audited/reviewed ensuring consistency and validity? – Obtain copy of available review/audits. 4. Evidence that mobile plant operators have received site specific training and have been 'deemed' competent (including sign-off by a suitably qualified person).

Findings (Fact & Opinion)

Implemented:

1. **Does the Operator have a system for ensuring that employees are 'deemed' competent to safely operate mobile plant?**

   In Part. Management informed WorkSafe that they have recently engaged Delta to provide mobile plant and have identified (within the last month) the requirement to develop Standard Operating Procedures (SOPs) for the mobile plant.

   During the 'change-over' process, management also identified the need to ensure that their employees (who operate the mobile plant) are deemed competent to operate the mobile plant.

   As a result, two qualified employees have been taken 'off-line' to develop the SOPs and conduct training to ensure employees are deemed competent. This process has just commenced.

   However, in the past, the operator of the mine has utilised employees to operate RTL owned mobile plant, no records exist that indicate employees were 'deemed' competent.

2. **Has the Operator identified the relevant training needs/requirements for employees to safely operate mobile plant?**

   In Part. See above comments. The operator has just commenced this process.

3. **V14 Annual Training Plan Procedure – DocID 41515 documents the site requirement to develop an annual training plan – Has the Operator developed an annual training plan for its employees? – Obtain sample copy.**

   No. A document/excel spreadsheet (no title) was provided (V52) as evidence of the site's annual training plan. The document lists 'training activity descriptions' and forecast budgets, however no employees (numbers) have been allocated for the mine site.

4. **Have resources been allocated including budgets and personnel to execute the annual training plan?**

   In Part. See comments above. Budgets have been allocated, employee numbers have not been included and it is unclear if the site has allocated personnel to execute the training activities.

   The mine site does not employ a training coordinator and relies heavily on suitably qualified operations and maintenance personnel to be 'taken off-line' to coordinate and conduct the training activities.

5. **Has the Operator assigned specific personnel (as documented within V14 Annual Training Plan Procedure – DocID 41515) to develop and execute the annual training plan? Are roles/responsibilities of personnel utilised to develop and execute the annual training plan**

clearly defined and understood?

In Part. V14 states that the Human Resources Business Partner (HRBP) located in the Mine, in conjunction with the Training and Development Coordinator will develop the annual training plan for the mine maintenance and operations personnel. A HRBP has been assigned however there is no Training and Development Coordinator for the mine. Roles and responsibilities of the HRBP appear to be understood.

6. **Are employees training records/licences and qualifications available, maintained and reviewed on a regular basis? – Observe and review random sample.**

   Yes. WorkSafe observed that the record keeping (hard copy employee files) are well maintained and reviewed.

Functional:

1. **Evidence that the annual training plan has been developed according to the Annual Training Plan Procedure – DocID 41515 (V14).**

   No. Management informed that the document (V52) referred to as the training plan for the mine was produced as a 'wish list' and based on historical training activities. A training needs analysis has not been conducted and as a result employee numbers have not been allocated to the training activities listed in V52. Furthermore the procedure (V14) has not been followed in planning all training and development activities for employees as stated on p. 1 of the procedure.

2. **Evidence that training is being conducted according to the plan as described within the Annual Training Plan Procedure – DocID 41515 (V14).**

   No evidence available to suggest that training is being conducted according to a plan.

3. **Is training conducted by a suitably qualified person and is the training regularly audited/reviewed ensuring consistency and validity? – Obtain copy of available review/audits.**

   Overall, In Part.

   Yes. Training is currently conducted by suitably qualified maintenance and operations personnel (cert iv training and assessment) and subject matter experts.

   No. Training (delivery) is not audited / reviewed. Trainers rely on oral feedback from trainees.

4. **Evidence that mobile plant operators have received site specific training and have been 'deemed' competent (including sign-off by a suitably qualified person).**

   In Part. At the time of the Verification, mobile plant training had just commenced, WorkSafe observed training records (theory and practice) at the site including 'sign-off' by a suitably qualified person.

Status (Yes/In Part/No - include explanation)

Implemented : In Part
Functional : No

Additional Comments

WorkSafe issued an Improvement Notice under Regulation 5.3.21(1) of the Occupational Health and Safety Regulations 2007 requiring the operator of a prescribed mine to establish and implement a Safety Management System for the mine, in accordance with this regulation.

Furthermore Regulation 5.3.21(3)(f) of the Occupational Health and Safety Regulations 2007 requires the operator's Safety Management System (SMS) to set out the systems, procedures and other risk control

measures by means of which risks to health or safety associated with mining hazards are to be controlled.

The training system (i.e. Annual Training Plan Procedure) is not being followed. The annual training plan has not been developed according to the procedure.

Compliance with the Improvement Notice V01017400348L/111-01 may be achieved by adopting the recommendations listed below.

Recommendations

Hazelwood to:

1. Develop the annual training plan as per the site procedure.
2. Identify training needs (in consultation with employees) in relation to performing work activities competently, including OHS training.
3. Review the allocated training resources (personnel and budgets).
4. Assess personnel as competent, on the basis of skills achieved through education, training or experience, to perform assigned tasks taking into account the OHS obligations, hazards and risks associated with the work activities.
5. Training to be carried out by persons with appropriate knowledge, skills, and experience in OHS and training.
6. Conduct regular audits of training delivery ensuring that training is consistent and valid.

Comments from the Operator on the Findings and Required Actions

We agree with the findings and actions will be completed as per Improvement Notice V01017400348L/111-01

7. ATTACHMENT B – Verification Findings Tool – Information

Control Measures Findings

Implemented	Functional	Level	Description
No	No	0	Control does not exist (at all) as described by the Mine or exists but is totally ineffective
In Part		1	Key components required for the control to prevent the MMH are missing
Yes		2.	Control exists as required but is: • not working; • not being used
	In Part	3.	Control exists as required and is: • not totally effective - achieving some performance standards at controlling the MMH; • doing the job but is not being tested; • not properly performance monitored, and/or • lacking description and/or being informally used
		4	Control exists, is effective and is performance monitored but does not meet some of its performance standards
	Yes	5	Control fully implemented and fully functional

Safety Management System Findings

Implemented	Functional	Level	Description
No	No	0	The operator of the mine has **not** established and implemented a Safety Management System that supports implemented control measures: • The SMS element does **not exist** at all, and the Corporate SMS is not directly relevant to the Mine e.g. regulation 5.3.21(3)(b) , and/or • Safety Assessment is not part of the SMS as required by regulation 5.3.21(3)(b) Performance standards for measuring the effectiveness of the Safety Management System have not been developed
In Part	No	1	The Safety Management System does **not** provide a comprehensive and integrated management system for all aspects of control measures adopted under Part 3 because the SMS element exists but: • Key components of the SMS element required to manage the control measure are **missing** such as lack of maintenance, inspection or training systems, or • Key components are present but are **not being used** to manage control measures, i.e. a process that sits outside the formal SMS system is being used to manage the control measure, or • Those aspects of the SMS element which have been implemented have been demonstrated to not be functional. • Performance standards for measuring the effectiveness of the Safety Management System may have been developed, but they have not been undertaken to a satisfactory level. Auditing activities have not been developed or have been ineffective in identifying issues with implementation.
In Part	In Part	2	The Safety Management System does **not** provide a comprehensive and integrated management system for all aspects of control measures adopted because the SMS element exists but: • Some key components of the SMS element have **not** been implemented, and • Those aspects of the SMS element which have been implemented have been demonstrated to functional. • Performance standards for measuring the effectiveness of the Safety Management System have been developed covering those aspects of the SMS element that have been implemented and monitoring has been undertaken. Auditing activities have been developed, effectiveness in identifying issues with implementation/functionality range from ineffective to fully effective.
Yes	No	3	The Safety Management System does **not** provide a comprehensive and integrated

			management system for all aspects of control measures adopted because: • The SMS element and key components are all present but are **not being** used to manage the control measure, i.e. use of other systems not included within the Mine SMS. Auditing activities have been developed, effectiveness in identifying issues with implementation/functionality range from ineffective to fully effective.
Yes	In Part	4	The Safety Management System does **not** provide a comprehensive and integrated management system for all aspects of control measures adopted because: • Performance standards for measuring the effectiveness of the Safety Management System **have not** been developed. • The SMS elements and key components are present, are being used and performance standards have been developed but the performance is **not** being monitored in accordance to the criteria detailed within the Mine SMS. Auditing activities have been developed, effectiveness in identifying issues with implementation/functionality range from ineffective to fully effective.
Yes	In Part	5	The Safety Management System does provide a comprehensive and integrated management system for all aspects of control measures adopted, however: • Performance monitoring activities indicate that the SMS **is not** meeting its required performance standard, and • Corrective action has **not** been developed or implemented Auditing activities have been developed but are deemed to be **only partially** effective in identifying issues with implementation/ functionality.
Yes	Yes	6	The Safety Management System does provide a comprehensive and integrated management system for all aspects of control measures adopted because SMS elements are implemented and are demonstrated to be effective by: • Performance monitoring activities that indicate the SMS is meeting its required performance standard, or • Performance monitoring activities indicate that the SMS is meeting its required performance standard, or where monitoring indicates deficiency in performance, that corrective action(s) have been developed, and monitored for implementation and effectiveness. Auditing activities have been developed and have been effective in identifying any issues related to implementation/functionality.

8. ATTACHMENT C – ADDITIONAL INFORMATION

C1 Entry Reports

Entry Reports were provided to site at the end of each day of the Verification (details below).

25th of July

V01017400344L (Inspector Hayes).

26th of July

V01017400345L (Inspector Hayes)

V00048403551L (Inspector Walschots) – including two Improvement Notices 111-01 and 111-02.

1st of August

V01017400348L (Inspector Hayes) – including two Improvement Notices 111-01 and 111-02.

9. ATTACHMENT D – SITE DOCUMENTS RECEIVED BY WSV

V1. Safety Management System Manual

V2. Major Mining Hazards Procedure

V3. Mobile Plant and Vehicle Hazard ID

V4. Organisation Chart

V5. Doc ID 48270 Purchasing Procedure

V6. Doc ID 3210 SMS Evaluation of Contractors

V7. Register of Site Light Vehicles and Mobile Plant

V8. Doc ID 48590 Traffic Management Procedure

V9. Doc ID 42664 Traffic Control and Haul Road management Procedure

V10. Doc ID 42637 Traffic Control Procedure for Temporary Works on or Near Roadways

V11. Doc ID 44673 Procedure for Working at the Top and Toe of Batters

V12. Maintenance Requirements and Schedules for Mobile Plant (RTL) and Light Vehicles

V13. Maintenance Requirements and Schedules for Dredger 10

V14. Doc ID 41515 Annual Training Plan Procedure

V15. Doc ID 45098 Operate light vehicle MNCG1061A (Incorporating 4X4) Learning Guide

V16. MMH2 GDF Suez Hazelwood Major Mining Hazard 2 Mobile Plant Interactions Draft V2 June 2013

V17. MMH5 GDF Suez Hazelwood Major Mining Hazard 5 Vehicle Interactions Draft V2 June 2013

V18. SC 0110 Road Maintenance Program including regular grading and road surfacing material

V19. SC 0328 Procedure SWI Safety inspection of mine roads

V20. SC 0331 Plant pre start checks

V21. SC 0340 Design/ Fit for purpose vehicle (light vehicle/forklifts/scissor lifts/bobcats/fire trucks/trailers)

V22. SC 0341 Competent and/or licensed operators

V23. SC 0166 Signage (Speed Limits etc)

V24. SC 0048 Maintenance – Vehicle Preventative Maintenance

V25. SC 0124 Contractor Management Process

V26. GDF Suez Hazelwood Mine – Mine Fire Service Policy and Code of Practice

V27. Pre-Start Operational Checklist

V28. Mine Light Vehicle (4X4) Standard Equipment

V29. Work Order List for Civil Works

V30. Plan of Emergency Access Routes July 2012

V31. Hazard Report for Road Issues

V32. Mine Road Layout Plan

V33. Updated Vendor Listing

V34. Maintenance Records for YSP621

V35. Light Vehicle Fleet review Project

V36. SMS Evaluation of Contractors Form SMS-3

V37. GDF Suez Site Arrangements and Conditions

V38. Shift Production Report showing identified hazards

V39. Daily Production Meeting schedule

V40. Delta Workshop Plant Inspection process

V41. Delta P&E SOP skid steer

V42. Delta Site Safety Management Plan

V43. Delta HIRAC for heavy equipment

V44. Belle Banne Email Communication and Maintenance Records

V45. RTL Work Instruction Haul Roads

V46. RTL Morwell GPS Study Cat 740D New Haul Road

V47. Hazelwood Mine Alternative vehicle exhaust shielding

V48. Mobile Plant Training, Competency & Authorisation Procedure

V49. Authority to operate mobile plant training matrix;

V50. 4x4 and light vehicle recovery training reports;

V51. Expired drivers licence report;

V52. Excel spreadsheet 2013 Annual training plan