

This SWP defines exactly how a specific task is to be performed. SWP will normally be part of a WMS or a standalone activity not requiring a WMS. The SWP defines, in fine detail, how a specific task is to be performed. There should normally be no reason to change this SWP. If changes are required, then a risk assessment must be completed.

Within Cleanaway , personnel interaction between mobile heavy equipment during loading and unloading operations is a significant safety issue.

To mitigate these safety concerns Cleanaway have introduced 'Loading / Unloading & Exclusion Zones (LUEZ)'

LUEZ guidelines are aimed at the safety of all personnel within the vicinity of powered mobile equipment during loading and unloading activities in order to reduce / eliminate the potential for injuries where equipment and personnel interact.

These guidelines empower the forklift operator to take positive control of their work environment.

Principle of LUEZ

- Communication
- Separation
- Control

Foundation of LUEZ guidelines

When loading / unloading activities take place, mobile heavy equipment and personnel should be segregated.

Authority for the area in which the loading / unloading activity is occurring shall reside with the Forklift Operator.

If the operator loses direct line of sight with any personnel authorised to be in the area, the activity shall immediately stop and not resume again until direct line of sight is re-established.

Mandatory LUEZ requirements

Prior to any loading / unloading, the person in charge of the activity needs to take positive control of their work environment.

Positive control will include an exclusion zone around the work environment to prevent unauthorised personnel or other mobile equipment from entering your area.

No unauthorised personnel or equipment are allowed to enter the exclusion zone without authorisation from the Forklift Operator.

A mandatory conversation will occur between the forklift operator and the truck driver / spotter. The conversation is to provide clear instruction to driver / spotter that the **operator is the authority** for the load / unload activity.

The driver / spotter has two options:

- Act as a spotter for the forklift operator to assist with the activity.
- Remove themselves from the exclusion zone entirely. *Driver / spotter shall remain outside the cab of the truck at all times.*

When a spotter is used, there **SHALL** be a physical barrier placed between the spotter and the activity taking place. If the spotter / driver is required to enter the exclusion zone, the forklift operator **MUST** stop movement of the forklift and lower the forklift tynes.

The exclusion zone and the barrier are used to allow the forklift driver to carry out the activity free from personnel / machinery interaction.

Warning Device – Exclusion zones and signage

A warning device is an indicator of an activity with an associated risk. Devices should be clear in their message and should inform you of potential risk. Warning devices may include :

- Signage
- Traffic cones
- Tape or bunting
- 205Litre MGB bins

The exclusion zone must be set out 3m from the trailer to be loaded on both the loading side and the opposing (dead) side.

See APPENDIX on Page 3

Clear rules of LUEZ

All personnel other than the operator and / or the spotter must remain outside the exclusion zone during the activity.

The spotter must remain in the safety zone – Unless authorised by the operator.

No personnel are allowed to enter the exclusion zone – Unless authorised by the operator.

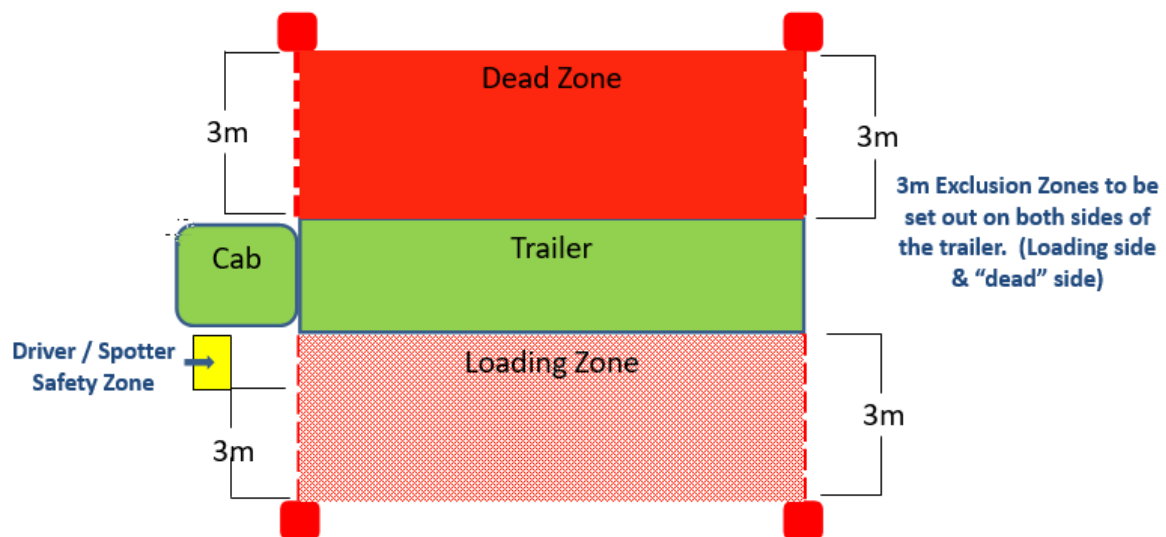
The forklift is to remain stationary with forks lowered at all times during any movement of authorised personnel within the exclusion zone.

Simultaneous movement of the personnel and equipment is **forbidden** within the exclusion zone. Driver **MUST NOT** strap down the load until the operator has finished loading the truck.

Failure to follow these procedures could result in serious injury to either persons directly involved or other work colleagues or third parties. It could also result in great additional expense to the company. Disciplinary investigations will be carried out on people knowingly deviating from this procedure and in certain circumstances this may be considered as gross misconduct.

Prior to commencing activity

- Forklift driver **MUST** hold a high risk license to operate a forklift (LF) and have completed a VOC for the yard forklifts.
- Read and acknowledge the associated WMS for the activity ie [Loading / unloading trucks](#)
- Perform a **SLAM** for the activity.
- Ensure the toolbox lids (if left open) do not impede the movement of the forklift when unloading
- Communicate the activity to the driver.
- Ensure control of the working area and separation of pedestrians and traffic is adequate for the activity.

Loading & Unloading Exclusion Zone

**No unauthorised personnel or equipment are allowed to enter the exclusion zone without authorisation from the Forklift Operator.
FORKLIFT OPERATOR IS THE AUTHORITY FOR THE ACTIVITY.**

I acknowledge to have read and understood the procedure.

[illegible]

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SITE INDUCTION BOOKLET

KARRATHA

PERMANENT INDUCTION MANUAL

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1. Introduction

Cleanaway LTS Karratha offers Waste Management & Industrial Services to the domestic market, offshore installations, industry and government agencies.

This manual is designed to provide new employees, contractors and visitors to Cleanaway LTS Karratha with an overview of the company, work activities, policies and procedures, hazards, methods of managing hazards and emergency and incident response procedures. Cleanaway LTS Karratha is a wholly owned subsidiary of Cleanaway LTS Solutions (TFS)

All employees and contractors working on site will be required to undergo a site induction to familiarise themselves with the site, its facilities and its hazards. These items are covered in the induction. For contractors the induction will need to be completed every 12 months.

On completion of induction complete the bottom of the induction checklist and submit to the site supervisor.

Please note all contractors are required to obey all directions given to them by Cleanaway LTS Karratha employees and must adhere to site policies, procedures and site licences.

The site operates in accordance with the QUEST (Quality, Environment, Safety & Training) integrated management system. New employees will receive QUEST training.

2. QUEST Policies

Cleanaway LTS has policies to cover all operations, stating its intent and methods of ensuring its aims are met. All policies are available on QUEST, however a few of the more critical Policies are:

- [QUEST Policy](#)
- [Return to Work Policy](#)
- [Drug and Alcohol](#)

3. Site Mentor Role and Responsibilities

The objective is to ensure that Short Service Employees (SSE) are identified, appropriately supervised, trained, mentored, and managed. This prevents accidents such as personal injury, injury to others, environmental and or property damage.

The Mentor is an experienced person who provides training, guidance and support for the new employee until they deem the person has a satisfactory understanding of their role. Mentor Roles will be assigned by the Manager or Operations Manager.

4. Motor Vehicle Usage

All employees are to follow the [Driving Safely Policy](#) and [Driving Safely Risk Management Control](#) for guidance of motor vehicle use. Some key points:

- Tool of trade vehicles MUST not be used for 4WD operation after hours. If vehicle needs to be driven on unsealed roads for Cleanaway LTS tasks, then four-wheel drive must be engaged (if fitted).
- Light passenger vehicles (cars, utes etc) may generally be used to transport non-Cleanaway LTS passengers on formed roads during Cleanaway LTS tasks and after hours where the vehicle is assigned to the driver as a tool of trade vehicle in accordance with the Motor Vehicle Policy.

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- For all other vehicle and mobile plant types it is generally prohibited to transport non-Cleanaway LTS personnel without the specific and prior approval by a Business Unit Manager who authorises such an exception for legitimate operational and commercial purposes for Cleanaway LTS.
- Cleanaway LTS vehicles cannot be used for personal use after hours use unless prior permission has been sought from the Business Unit Manager.

5. Drug and Alcohol policy

All employees are to:

- Act in a responsible manner and present for work in a fit and healthy state.
- Notify their manager or supervisor if they are experiencing any condition, such as fatigue or other illness that may affect judgement of performance.
- Notify their manager or supervisor if taking prescription medications which have been identified as having the capacity to affect judgement of performance prior to the start of their shift.
- Seek advice from a doctor about compatibility of all prescribed medicines with work.
- Report instances of suspected unauthorised drug or alcohol use to their immediate manager or supervisor.
- Undergo testing as and when required as per Cleanaway LTS 's Drugs and Alcohol Procedure.
- Failure to undergo testing as and when required will be treated as a non-negative for alcohol or drugs.

6. Personal Protective Equipment

Cleanaway LTS Karratha's Personal Protective Equipment (PPE) requirements are mapped out into two zones:

Green Zones – Areas which are generally free from any specific risks and do not warrant the consistent wearing of PPE (i.e. Office and administrative areas).

Red Zones – Work within operational zones which requires the wearing of minimum PPE and any job specific PPE.

Minimum PPE for Operational Areas (Red Zone)

Minimum PPE requirements include safety boots, safety glasses, gloves (to be carried at all times must be minimum cut & puncture rating of 3 or above), high visibility long sleeved shirts and trousers.

Cleanaway LTS Karratha is divided into two zones, green & red (see attached map).

Operational areas have more demanding PPE requirements. For example, hearing protection may be needed in specific areas prevalent with high noise levels and harnesses are required for working at heights.

Heat Stress

Ensure adequate sun protection and access to fluids while on site to minimise the potential of heat related illnesses such as heat stress. It is important to know and understand the signs and symptoms of heat exposure and how to respond. If you would like further information or are concerned you may be demonstrating the symptoms of heat exposure please advise your site contact, the Site Manager or First Aider.

7. Incident and Accident Reporting

Incidents include events, which occur during work activities or site operations, which have potential to result in impact to the environment or property. Environmental incidents may include a spill of an environmentally hazardous material.

Accidents are events, which result in personal injury to employees or visitors to the site. Accidents are classified as first aid injuries, medical treatment injuries and lost time injuries. Near misses and hazards must also be reported.

The reporting of hazards, near misses, incidents and accidents will ensure there is a documented method to investigate the cause of the event so that reoccurrence can be prevented. Incident, accident and near miss reporting aids in the continual improvement of health and safety for employees at Cleanaway LTS Karratha and ensures any impact to the environment is minimised.

Employees and visitors shall immediately report any incident, injury, illness or near miss to their nearest Responsible Person (Supervisor, Team Leader, onsite contact) by using an [Observation Report](#) or by phone, as per the [Issue Resolution, Incident Response and Investigation Procedure](#) and [Incident and Issue Resolution Process](#).

Employees are to take any necessary action possible (where practical and safe to do so) to help minimise the harm arising from an incident. NOTE: Any injury, illness no matter how small must be reported and assessed.

8. Visitor Controls

All visitors to site must be authorised for entry by the Site Manager or a Cleanaway LTS Representative. They are always to be escorted by an inducted employee of Cleanaway LTS Karratha. Visitors who are required to work on site shall undergo an induction prior to commencing work and sign the Health, Safety and Environment Visitors Induction Brochure and complete Permit to Work document.

All visitors onsite are to record their visit details in the Visitor/Contractor Logbook at the Weighbridge. Visitor tag or Visitor Vest is to be worn onsite at all times.

9. Quarantine Area on site

Karratha Operations work in conjunction with our Chevron Operations on Barrow Island, we have strict quarantine regulations in place on site.

Please ensure in the marked Quarantine areas that no food or drinks are to be consumed and any signs of wildlife is reported immediately to your Cleanaway LTS Representative.

10. Working at Heights

Cleanaway LTS Karratha recognises that its employees may be required to work at heights. This may occur as either a part of a project on a customer site or while maintaining the company's own plant and equipment.

Fall injury prevention systems have been put in place to prevent any falls from heights. A fall injury prevention system means equipment and/or materials that are intended to prevent or reduce the severity of an injury to a person if a fall does occur.

Workers who are required to use fall prevention systems will be trained and instructed in their use. Working at heights is not to be conducted by any untrained operators. Refer to the [Working at Heights Risk Management Control](#) for more information, available on QUEST.

11. Confined Spaces

Cleanaway LTS Karratha recognises that its employees may be required to work within and around confined spaces. This may occur as either a part of a project on a customer site or while maintaining the company's own plant and equipment.

Workers required to enter confined spaces will be specifically trained and instructed in the process. Confined space work is not to be conducted by any untrained operators. Refer to the [Confined Space Risk Management Control](#) for more information, available on QUEST.

12. Manual Handling & Safe Lifting

Manual handling activities are a part of almost every position within Cleanaway LTS. Following proper procedures when conducting manual handling tasks can significantly reduce the risk of injury.

As part of your training with Cleanaway LTS, all workers are required to complete an online Manual Handling training course. This course provides information on how to safely identify, plan and perform manual handling tasks to maintain an injury-free workplace.
<http://aveling.com.au/safety-courses/manual-handling-course-online.htm>

13. Electrical Safety and Isolations

Electrical installations and equipment shall be operated and maintained so as to avoid danger to staff, machinery and equipment. All electrical equipment must be inspected, tested, registered and are subjected to periodic safety inspection.

When required, isolation procedures must be followed to turn off and lock out power and energy sources to equipment. This includes placing an appropriate tag at the point of isolation. Types of tags used to isolate energy sources are:

Danger Tags: Used to protect the person whose name appears on the tag from injury while work is conducted on the piece of equipment. This tag can only be removed by the person who placed the tag.

Out of Service Tags: Used on plant and equipment that is faulty, awaiting repair or parts, or awaiting removal for disposal; and is unsafe to be used. Under no circumstance is an 'Out of Service Tag' to be used for personal protection. This tag may be removed by the person who placed the tag; the person who repaired the plant or equipment; or a responsible manager.

Refer to the [Serviceability Tags RMC](#) for further information, available on QUEST.

14. Chemicals and Hazardous Substances

There are two classifications of hazardous materials that exist on site:

1. The materials purchased for use in working in and around the plant e.g. reagents
2. The waste materials stored onsite for treatment/disposal e.g. hydrocarbon wastes

Materials from Category 1 are found in the bunded tank farm area. Safety Data Sheets and Dangerous Goods Evaluations for these materials are located in the office.

Materials from Category 2 are all stored in the storage tanks and dangerous goods bund. Safety Data Sheets for these waste materials are located in the process technician office as well as online via ChemWatch.

Responsible managers shall ensure all personnel who are involved with storage, handling, transport, use and disposal of dangerous substances shall receive the appropriate training.

15. Biological Hazards

There are biological hazards associated with the collection, handling and treatment of controlled waste (specifically category 1.01 – 1.05 of the Controlled Waste Regulations). Any employees involved in the collection, handling and treatment of these wastes will be offered the necessary vaccinations and health surveillance.

16. Environmental Controls and License Requirements

Cleanaway LTS Karratha operates under two licenses: An Environmental Protection License issued by the Department of Environment and Regulation (DER); and a Dangerous Goods License issued by the Department of Minerals and Petroleum Resources (DMPR).

The environmental site license outlines the conditions necessary to ensure work activities are carried out safely with minimal impact to the environment.

Copies of these licenses are available via QUEST for all employed to access. Specific training on your responsibilities regarding the licences will be scheduled by your supervisor.

17. First Aid/Medical Treatment Procedure

All incidents on site requiring first aid or medical treatment must be recorded firstly on an [Observation Report](#) and then in MyOSH (an [Incident Investigation Report Form](#) may be used if preferred). A responsible supervisor and/or manager must be notified and record the incident, time occurred, place, job description, number of people involved any other relevant information.

A First Aid Room is located in the Fortescue building. The locations of the first aid kits are in Operations, Gorgon Office and Administration Building. There is a First Aid kit in the HAZMAT Emergency Response Trailer.

A list of First Aid officers is displayed on the QUEST noticeboard, and on QUEST.

18. Fire extinguishers

Fire extinguishers can be found at various locations around the site. These are indicated on the [Site Map](#). Once used, these should be laid on their side near the storage crate at the rear entry of the laboratory and replaced with a spare from the storage crate. All usages of fire extinguishers should generate an Observation Report, unless used for training purposes.

Fire hoses should be coiled and left on the reel. These shall be used for fire fighting and emergency use only as fines for both the individual and company exist for misuse of equipment.

19. Work Method Statements and Permits to Work

There are Work Method Statements (WMS) written for all standard work activities on site. A WMS combines a step by step procedure of the task, with a risk assessment of each step. Copies are kept on QUEST and are available to view at all times. Every employee MUST read all the WMS relevant to their duties.

In conjunction with the hazards and controls identified in the WMS, a Step Back 5x5 must be completed for any new, high risk or specifically identified task. The Step Back 5x5 is used to assess the task to be undertaken to identify hazards and implement controls that a generic WMS may not be able to account for (e.g. changes in the environment).

Your supervisor will show you how to complete a Step Back 5x5 and provide you with a Step Back 5x5 book.

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Permits to Work are required by all contractors performing work on site. This excludes delivery/truck drivers who are on site to be either loaded or unloaded. Please ensure your Permit to Work has been signed off by the person who has engaged you to carry out the work or the yard leading hand.

20. Site Emergency Procedure

In the case of an emergency, the yard siren will sound as a continuous tone. All Cleanaway LTS staff and visitors must observe the following.

- Obey the site emergency warden's instructions to evacuate.
- Leave belongings where they are situated – do not go back to retrieve personal items.
- Do not run / panic – still maintain safe practice.
- Turn off machinery / equipment if practical.
- Strictly follow the Evacuation Procedure.
- Make sure you have been accounted for in the head count at the muster point – also determine who is not present if applicable.

Muster point locations on site:

- Muster 1 – Outside admin - Administration building area beneath the tallest radio aerial
- Muster 2 – Rear IBC Area - North West Corner of the site in the Gateway
- Muster 3 – Rear Pond Area - South West Corner of the site in the Gateway
- Muster 4 – Old Camp Area - Eastern boundary fence line approx. halfway along the fence line
- Muster 5 – Inside Front Gate
-

Please ensure to read the *Karratha Emergency Evacuation Plan* for the site which is located on QUEST. A list of site Emergency Wardens is posted on the QUEST noticeboard and other prominent locations around site

The speed limit on site is **10km/h and MUST be observed by ALL VEHICLES**. Please note the speed limit across the weighbridge is 5km/hr. All vehicles are required to report to the Weighbridge upon entry to operational areas.

Heavy vehicles are asked to activate their Amber beacons whilst in the operational area.

Be aware of operating machinery and always remain vigilant with regards to vehicle interactions. Vehicles must radio the weighbridge (**UHF Radio Channel 8**) before proceeding to exit the yard to ensure the weighbridge is clear.

22. Loading & Unloading on Site

Loading/Unloading Exclusion Zones (LUEZ) are used on this site. Before being loaded or unloaded, each vehicle will have an exclusion zone put in place by the forklift operator.

PLEASE REMEMBER THE FORKLIFT OPERATOR IS THE AUTHORITY WHEN LOADING & UNLOADING.

DO NOT AT ANY TIME STAND OR CLIMB ONTO THE BACK OF A TRUCK.

21. Vehicle Movements

23. Cyclone Preparedness Plan

Cleanaway LTS Karratha has a [Cyclone Preparedness Plan](#) in place which outlines the requirement of planning, preparation and management needed to minimise the impact of a cyclone to the site and personnel. Please review the plan, which is located on QUEST.

24. Toolbox Meetings & QUEST Committee

Toolbox meetings will be conducted on regular basis (at least monthly). All personnel are entitled to call a meeting if urgent issues need to be resolved. A template for [Toolbox Meeting Minutes](#) is available on QUEST. All workers present on site are required to attend these safety meetings with the Site Manager or Supervisor conducting the meetings.

The site also has a QUEST Committee, comprising of management and employee representatives from each work group. This committee will meet monthly to discuss Quality, Environment, Safety & Training for the site. Information from these meetings will be posted on the QUEST notice board, as well as discussed at your toolbox meetings.

A list of QUEST Representatives is located on the QUEST noticeboard and on QUEST.

25. Use of Headphones and personal listening devices

There is a **TOTAL BAN** of the use of headphones in operational areas. They severely limit a person's ability to maintain awareness and hear the surroundings. A speakerphone is permitted, or a small radio playing at a reasonable level. All radios must be tagged before use on site.

26. Smoking

Smoking on site is strictly prohibited with the exception of the designated smoking areas. Please discard of cigarette butts appropriately; failure to comply will result in a written warning.

Designated smoking areas are signposted and listed below:

1. Behind the Weighbridge between the storage sea containers.

27. Site Facilities Familiarisation

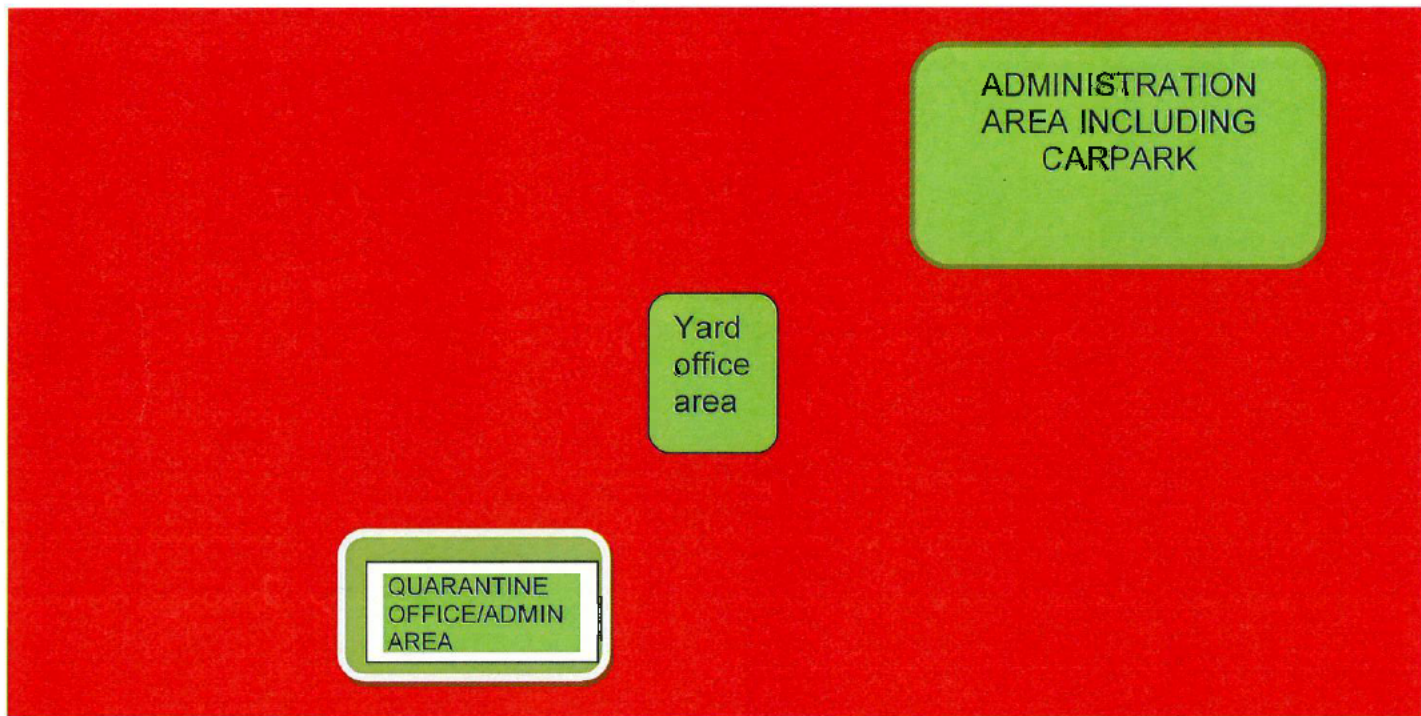
New employees are to be given a guided tour of the site, identifying at least the following areas:

- Location of toilets, kitchen, office facilities
- Workshops
- Location of fire hoses, extinguishers and spares
- Muster Points
- PPE Requirements
- Emergency response equipment / First Aid Stations
- Process areas
- Designated Smoking Areas
- Site speed limit (10km/hr)

CLEANAWAY LTS KARRATHA PPE ZONES

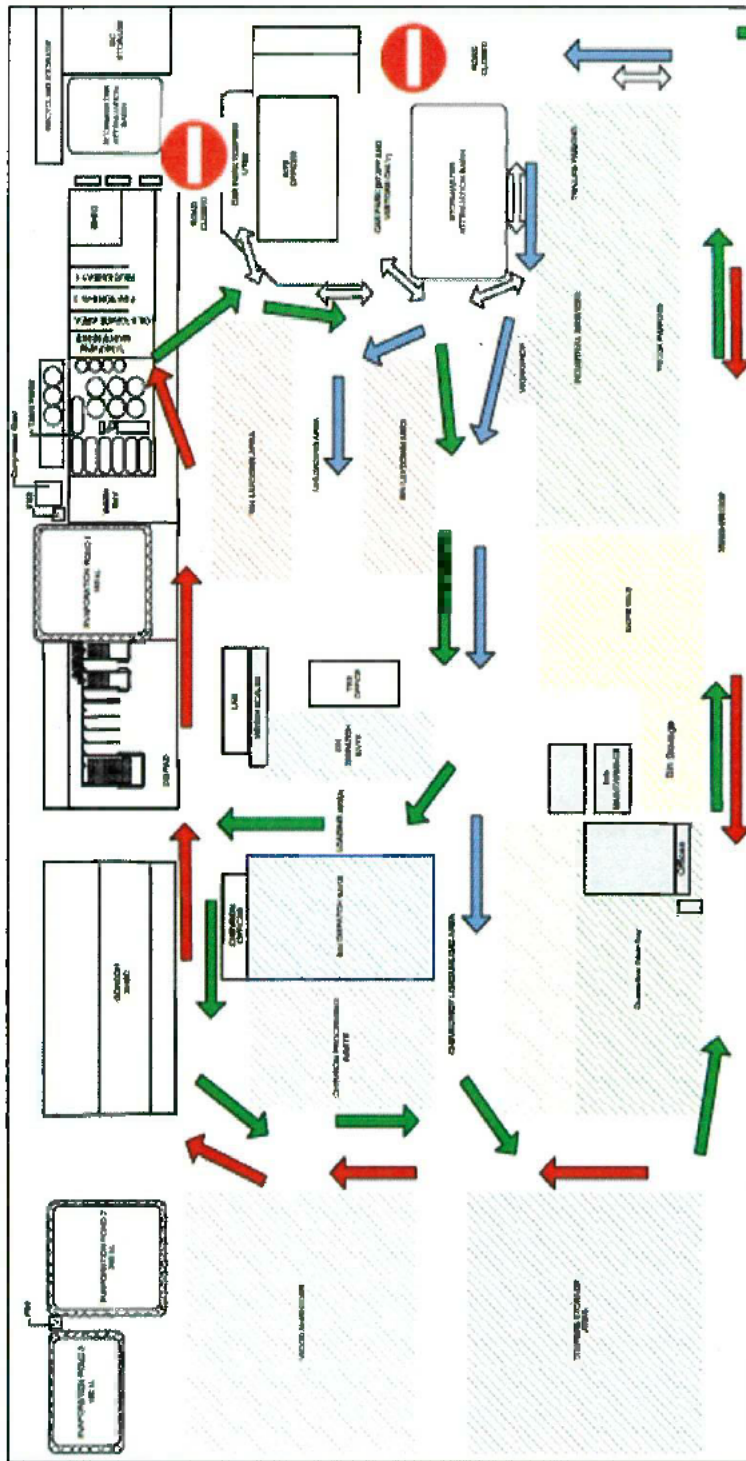
GREEN ZONE= NO PPE REQUIRED

RED ZONE= FULL SITE PPE REQUIRED (GLOVES, LONGSLEEVED SHIRT AND PANTS WITH HIGH VISIBILITY, SAFETY BOOTS AND SAFETY GLASSES)



PERMANENT INDUCTION MANUAL

All truck drivers please
contact weighbridge on
channel 8 for entrance
at site entrance



	Toxfree Karratha, Tom Price Rd. KARRATHA WA 6714 TRAFFIC MANAGEMENT PLAN	28/01/2015 Olive Young Revision: 1



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INSPECTOR REPORT

COMCARE REFERENCE NUMBER	MC00025237
PCBU DETAILS	Name: Cleanaway Operations Pty Ltd ABN: 40 010 745 383 ACN: 010 745 383
REPORT ISSUED TO	Name ^{s 47F} Position: Head of Health & Safety & Regulatory Compliance Cc: N/A
BACKGROUND	
<p>1. On 4 January 2022 Comcare received information from Cleanaway Operations Pty Ltd (Cleanaway) regarding an incident (the incident) that occurred that day at a Cleanaway workplace located at Lot 126 Tom Price Road Karratha, Western Australia (the workplace). Cleanaway is the person conducting the business or undertaking (PCBU) in relation to the workplace. The information received indicated the following, in part:</p> <p><i>'A Cleanaway worker utilising a forklift (the forklift), was attempting to load an empty skip bin (the work task) onto the back of a K-Trans truck (the truck) when the K-Trans truck driver (the truck driver) who was assisting, was struck in the head by the skip bin (the skip bin). The truck driver has received a non-critical head laceration as a result. An ambulance was called to the workplace to treat the injured worker and the forklift driver (the forklift worker) who is understood to have sustained shock.'</i></p> <p>2. I, (Inspector ^{s 22} commenced an Inspection (the Inspection) in relation to this matter on 6 January 2022 to monitor and enforce compliance with the <i>Work Health and Safety Act 2011</i> (Cth) (WHS Act) and the <i>Work Health and Safety Regulations 2011</i> (Cth) (WHS Regulations).</p> <p>3. It is my understanding that the truck driver sustained a facial laceration, a fractured arm, and a fracture to neck vertebrae / skull due to the incident. It is also my understanding that the truck driver is undergoing rehabilitation and is recovering from the injuries. Based on the information obtained, the forklift worker did not sustain any physical injuries due to the incident but was provided with medical assistance for the shock sustained.</p> <p>4. The scope of the Inspection was to assess Cleanaway's system of work associated with the work task (i.e., forklift loading of the skip bin onto the truck at the workplace). Based on the information obtained, the (16-tonne) forklift used by the forklift worker during the incident was under the control and operation of Cleanaway. In relation to the skip bin, Cleanaway</p>	



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informed that it is owned by an external entity, but it was stored at the workplace and used for loading / transportation during the work task.

5. The truck and flatbed truck trailer (the truck trailer) that the skip bin was being loaded onto during the incident was under the control and operation of Allpoint Nominees Pty Ltd trading as K-Trans WA (K-Trans).
6. K-Trans is contracted by Cleanaway under a 'Transport and Logistics Services Agreement' (the Services Agreement). As per the Services Agreement K-Trans was contracted to undertake various services, which includes the provision of trucks and trailers at the workplace for transportation of containers (e.g., skip bins).
7. During the Inspection I confirmed that the incident had been notified to WorkSafe WA (WorkSafe).
8. Cleanaway is a Commonwealth PCBU within the scope of the WHS Act. K-Trans is a State based entity that is neither a Commonwealth entity nor Commonwealth licensee. In consideration of these factors, including WorkSafe's confirmation of their receipt of the incident notification in this matter regarding the State based contractor's (i.e., K-Trans) involvement, the scope of this Inspection focussed on the duties and obligations of Cleanaway.

OUTCOMES

9. I formed a reasonable belief that Cleanaway did not comply with its duties under the WHS Act. Specifically, Cleanaway has contravened the following:
 - a. Section 19(1) ('Primary duty of care') of the WHS Act. Refer to the reasons set out in the Compliance Assessment section of this Inspector Report.

Remedial actions

10. While I formed the reasonable belief that Cleanaway did not comply with its duties, I am satisfied effective control measures have now been implemented. The Inspection is now closed however should an incident of a similar nature occur anywhere within Cleanaway in the future, Comcare will seek to confirm that Cleanaway has ensured the control measures are, and are maintained so that they remain, effective. Learnings regarding control measures resulting from the incident should be applied across the organisation where applicable.



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COMPLIANCE ASSESSMENT

11. I determined a site visit was not necessary to examine the incident scene. In this instance sufficient information was able to be obtained using statutory powers.

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19. Information provided during the Inspection indicates that Cleanaway had a 'Loading and Unloading Zones' guideline (**the LUEZ**) which I understand was applicable to the workplace at the time of the incident. The LUEZ provides instruction that when loading / unloading activities take place, mobile heavy equipment (e.g., forklifts) and personnel should be segregated. Furthermore, in instances where a spotter is used during forklift activities a physical barrier (e.g., an exclusion zone) is to be placed between the spotter and the forklift activity.
20. Upon review of the Site Induction undertaken by the forklift worker, I note that the Site Induction briefly mentions the LUEZ and indicates that exclusion zones are to be implemented by the forklift operator. However, the Site Induction does not include any further details about how an exclusion zone is to be established.
21. During the Inspection, Cleanaway indicated that the LUEZ was the procedure relevant to the work task. Upon review of the LUEZ, I note it stipulates that 'authority' for the area in which a forklift loading / unloading activity is occurring, rests with the forklift operator. However, the LUEZ does not make any reference to the use, placement, or adjustment of wooden gluts during forklift loading of skip bins onto truck trailers at the workplace, such as the work task that was occurring at the time of the incident. The LUEZ also does not specify what (if any) workplace supervision is required to be provided during such forklift loading activities and does not outline where any materials for establishing exclusion zones are stored / located at the workplace.



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26. In summary, I note the following in relation to the system of work associated with the work task:

- The practice of transporting and loading the skip bin onto the truck trailer with the forklift tynes positioned underneath, rather than inside the tyne pockets created a risk of the skip bin becoming unstable on top of the forklift tynes. As outlined earlier in this report, the practice of lifting the skip bin in this manner meant that it was not lifted via its specifically designated and engineered tyne pockets, which would have provided greater stability while the skip bin was transported / lifted via the forklift.
- The reliance on placement, positioning, and adjustment of wooden gluts on the truck trailer by the truck driver, created a risk of the truck driver approaching the skip bin while it was a suspended load and being lifted into position onto the truck trailer by the forklift worker. Based on my review of the information obtained, the forklift worker required the truck driver to adjust the positioning of the wooden gluts on the trailer,



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as the forklift worker was attempting to position the skip bin onto the wooden gluts in a stable manner, via use of the forklift.

- The safety hazards created by these practices do not appear to have been adequately risk assessed. Based on the information obtained, it is my understanding that a designated risk assessment was not completed for this practice (i.e., transporting / loading the skip bin onto the truck trailer with the forklift tyres positioned underneath, rather than inside the tyre pockets, including the associated use of wooden gluts).

In consideration of the above factors, I formed the reasonable belief that Cleanaway did not provide a safe system of work associated with the work task, as per the requirements of section 19(1) ('Primary duty of care') of the WHS Act.

27. The information obtained indicates that Cleanaway took reasonable actions following the incident. Of note, were some of the following actions:

- The truck driver was provided with medical assistance and conveyed to hospital for medical treatment. The forklift worker was also provided with medical support and assessment.
- The skip bin, including all other similar skip bins were 'tagged out' and taken out of service from the workplace. All replacement skip bins have forklift tyre pockets that enable forklift tyres to be utilised appropriately during loading / unloading activities. Furthermore, the workplace no longer accepts skip bins without suitable tyre pockets.
- The use of wooden gluts has ceased at the workplace, as wooden gluts are not required for use with the replacement skip bins which allow forklift tyre pockets to be utilised during forklift loading / unloading activities.
- All loading and unloading activities at the workplace were ceased until appropriate exclusion zones / driver safety zones could be established. Furthermore, additional supervision measures have been implemented to monitor such requirements.
- An enterprise 'Serious Incident Notification' was issued across Cleanaway's business, with all sites directed to review and provide evidence that exclusion zones are in place and effective.
- The LUEZ applicable to the workplace was reviewed and resigned by all workplace staff. The workplace Traffic Management Plan was also updated to include additional details on exclusion zone requirements.



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28. I am satisfied that Cleanaway's actions following the incident are appropriate, and that the undertaking of these actions assists Cleanaway with ensuring the effectiveness of relevant control measures.

29. Noting my compliance assessment, please refer to the 'Outcomes' section of this Inspector Report.

	Inspector	s 22
	Inspector ID number	181
	Email	s 22
	Phone	s 22
	Date	05/04/2022
	Signature	s 22



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This report contains information that may assist you to take steps regarding your obligations under the WHS Act. You must refer to the Commonwealth *Work Health and Safety Act 2011* (WHS Act) and the *Work Health and Safety Regulations 2011* (WHS Regulations) to understand your duties and obligations. Comcare's external website contains links to WHS legislation.

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IF YOU DO NOT AGREE WITH A DECISION

If you disagree with the outcome of this inspection, you may seek an internal reconsideration of the inspector's decision. A request for a review should be sent to statutory.oversight@comcare.gov.au including any additional information or evidence you have to support your request. Comcare will review your request and advise of the outcome in writing within 20 business days.

If you would like to clarify any aspect of this report, you can contact the inspector directly.

Comcare has a range of publications and fact sheets to help explain your responsibilities and provide guidance to make your workplace safer. The Compliance and Enforcement Policy provides guidance as to how Comcare approaches regulation. To access these, visit our website.

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In exercising our functions and powers, Comcare may disclose personal information, subject to confidentiality of information provisions under the WHS Act, to the following bodies and agencies, including but not limited to:

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- a court or tribunal
- state or territory work health and safety regulatory agencies
- personnel engaged by Comcare to conduct research related activities
- enforcement agencies or bodies
- state and territory Coroners
- Commonwealth, state or territory industry regulators
- any other person assisting Comcare in the performance of its functions or exercise of its powers, including contractors and consultants
- any other person where there is an obligation under law to do so (for example but not limited to, responding to the direction of a court to produce documentation).

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