



HSE-PRO-032 PERMIT TO WORK

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this document is to define a minimum safe system of work being performed at sites controlled by Mid West Ports Authority (MWPA) to ensure a high level of protection for people, environment and property.

This document applies to all non-routine and/or potentially hazardous work performed on all MWPA land and its waters, including:

- bulk handling facility (BHF)
- bulk mineral sands storage area
- roadways
- berths
- inner harbour
- fishing boat harbour
- secure zone
- Leaseholder premises (note that some exclusions apply to leased premises as outlined section 3.1.2 of this procedure).

All Permit to Work activities must, at a minimum, comply with:

- *Occupational Health and Safety Act 1984* and Regulations 1996
- *Mines Safety and Inspection Act 1994* and Regulations 1995
- *Rail Safety National Law (WA) Act 2015* and Regulations 2015.

1.2 Scope

This document is used to plan and control work which is considered potentially hazardous, to ensure a common understanding between MWPA, contractors and other Port users who perform work.

The main objective of the Permit to Work system is to:

- Ensure that all non-routine or hazardous work conducted on MWPA controlled sites is conducted in a manner which is safe.
- Ensure all works are coordinated to avoid conflicting activities to maintain a safe working environment.
- Ensure that the applicant accepts all responsibilities associated with the safe execution of works for which the permit is issued.
- Ensures that the work area has been inspected, identifying existing and potential hazards.
- Ensures that any equipment used is fit for purpose and ensures all necessary precautions have been considered before the work is authorised.
- Ensure that persons undertaking work have appropriate competencies.
- Ensure that after work has been completed, the work site is left in a safe condition.

2.0 ROLES AND RESPONSIBILITIES

To ensure the Permit to Work system is effective, all individuals must clearly understand and take an active role in meeting their responsibilities. Due to the potential hazards associated with permits to work, the specific responsibilities outlined below must be adhered to.

2.1 Permit Authoriser

The Duty Wharf Supervisor is responsible for receiving, recording and issuing ALL permits for work being undertaken on Port marine and landside sites. Upon receipt of a permit request, the Duty Wharf Supervisor must check the permit being submitted is the latest version and has been completed correctly. They must also ensure there are no conflicting activities during the requested permit timeline, register the permit and forward to the relevant parties for approval.

Once approved, the Duty Wharf Supervisor will issue the permit to the requestor and communicate any conditions required. The Work Permit Register will be maintained with the following information:

- Date permit lodged
- Date work to commence
- Permit expiry date
- Permit no.
- Permit type (e.g. working at height, hot work)
- Status (e.g. approved, pending, complete)
- Applicants name
- Company name
- Area where permit is approved
- Work description
- Who processed the permit
- Who approved the permit
- Any comments
- Permit reference number (tracked on Permit Board)
- Once advised of works being complete, update Work Permit Register status to Closed, record name of Duty Wharf Supervisor who closed the permit.

2.2 Permit Applicant

The Permit Applicant must:

- Ensure that all requirements specific to this procedure are met.
- Fill out the permit in detail and with accurate information to ensure the Authoriser has sufficient understanding of the activity being undertaken.
- Ensure all potential hazards are identified and precautions are put in place through a risk assessment.
- The 'signed' permit must be kept at the job and available upon request.
- Ensure work is conducted in a safe manner and in accordance with relevant legislation, standards, Codes of Practice and industry best practice as a minimum.

2.3 HSEQ Manager

The HSEQ Manager will:

- Ensure this procedure is developed and reviewed with adequate consultation and authorising approval and amendments to this procedure.
- Ensure that Permit Authorisers are appropriately trained to carry out their duties.
- Ensure regular audits of the Permit to Work system are scheduled.

2.4 Approvers

The Permit Approvers, which include Wharf Supervisors, Senior Engineers, Operations Supervisors, Maintenance Supervisors, Electrical Supervisors and/or BHF, Marine and HSEQ will assist in the assessment of permit documentation as required.

2.5 Employees

In addition to the responsibilities of the Applicant and the Authoriser, where applicable, MWPA employees have the responsibility to:

- Ensure that the work undertaken in the course of their duties is completed in accordance with this procedure.
- Bring any unsafe act or condition during the operation of a permit to the attention of the personnel performing the work and the Duty Wharf Supervisor. All personnel have the right and duty to 'stop the job' if they feel that it is unsafe to continue.

2.6 Breaches and Penalties – External Parties

Permits may be withdrawn without notice if any of the conditions of approval or protocols are not followed.

Where external parties are not sure on the application of this procedure, contact should be made with MWPA's Duty Wharf Supervisor on (08) 9964 0510. Note that the *Port Authorities Act 1999* gives MWPA legislative power to commence proceedings for unauthorised activities on Port land. Penalties can range between \$5,000-\$12,000.

3.0 PROCEDURE

3.1 Type of Work requiring a Permit

3.1.1 When a Permit is required

MWPA requires a permit to be submitted for any of the following activities within the Port area, including the Fishing Boat Harbour, Port roads, Port waters and lease sites (note some exclusions apply to lease sites [refer Section 3.1.2]):

- Blast
- BHF Authority to Work
- Crane Lift
- Chute Entry
- Confined Space
- Drone Operations
- Electrical access
- Excavation / Penetration
- Explosive Substances
- Fuel transfer (bunkering)
- Fumigation of a vessel
- Hot work
- Permission to Immobilise
- Traffic Management
- Works in the MWPA Rail Corridor
- Working at Height
- Work Afloat and Dive Permit.

3.1.2 Exclusions - Work NOT Requiring a Permit

For leaseholder activities undertaken on land that is leased from MWPA, a MWPA permit is not required for work (apart from excavation/penetration work) on the condition that the work:

- Has no impact whatsoever on other Port users.
- Will not impact on any MWPA services (for example power, water, etc.).
- Will not impact on any MWPA infrastructure, buildings, plant, equipment, etc.
- Is unlikely to create a risk to any other person or property.
- Is conducted within the confines of the lease.

Note: An excavation/penetration permit (HSE-PRO-032/FRM01) is always required for any type of work due to the risk of exposing or damaging critical services including high voltage power.

For vessel based cranes, lifting on or off a vessel, a crane lift permit is not required for the following:

- A 3 tonne load spread over a 1 m² bearing pad, except on Berth 4 infill area where 3 m spacing c/c is required.
- A 14 tonne load spread over a 1 m² bearing pad with a minimum spacing of 7 m c/c except on the fender line on Berth 4 infill.

To determine loading capacity on decks, a copy of the MWPA Wharf Specification Booklet is available on the MWPA internet site under Publication and Forms.

Where there is any doubt about the need for a permit, contact should be made with the Duty Wharf Supervisor on (08) 9964 0510 or to permits@midwestports.com.au

3.2 Job Safety and Environment Analysis

Any work requiring a permit is considered to have a different risk when compared to routine work. Each work activity requiring a permit also requires an approved Job Safety Environment Analysis (JSEA) supporting the works associated with the permit.

3.3 Applying for Permits

The person performing the work, or their supervisor/company representative will endeavour to apply for the permit 48 hours (or 2 business days) prior to commencement of the work. If the person undertaking the task is unable to apply for the permit, then a representative who is responsible for the work can fill it out on their behalf. The representative must then ensure the person performing the work is aware of the contents of the Permit and ensure they have a signed copy of the Permit and supporting documentation with them at the job site.

For Excavation/Penetration permits, these will be issued to, and approved by Engineering and Landside Maintenance prior to activities commencing.

Crane Lift permits shall be issued to, and assessed by the Engineering Department. Permit approval can be given by the Duty Wharf Supervisor, Maintenance Supervisor, Operations Supervisor or Senior Engineers after referencing MWPA's Wharf Specifications Booklet prior to activities commencing.

Note: All Crane Lift Permit applications for lifts occurring on any of the Berths 1, 2, 3, 4, 5 or 6 shall include Attachment B upon which the location of the lifting operation is to be indicated as accurately as possible by the applicant.

For Traffic Management permits, these will be issued to, and approved by HSEQ. If required, the Duty Wharf Supervisor can approve prior to activities commencing.

For any work to be undertaken within the Bulk Handling Facility (BHF), these will be issued to, and approved by, Duty Operations Supervisor prior to activities commencing.

For any work to be undertaken within the Rail Corridor, these will be issued to, and approved by the Duty Rail Operations Coordinator prior to activities commencing.

Any MWPA maintenance activities of more than one hour duration over the face of a berth, under a berth, on the water in the basin or on the water in the channel, and utilizing any vessel, pontoon, floating platform or barge as a means of transport and working platform will require a Work Afloat and Diving Permit (HSE-PRO-032/FRM07) . Routine MWPA maintenance activities that will take less than one hour require a verbal authorisation from the Pilots Office. Verbal authorisations are required to be recorded in the log book situated in the Maintenance Supervisor's office. The Ship Scheduler or Duty Pilot will record the verbal authorisation on the Work Afloat whiteboard in the Pilots office.

Note: For MWPA employees applying for permits, these permits will be applied for, where possible, the day before in consultation with the Supervisor of the work and will be signed off by a Permit Authoriser on the day before or on the day.

When completing the permit, the applicant must:

- Clearly specify the nature, location and estimated duration of the work.
- Ensure all sections of the permit are complete with sufficient detail to clearly identify the work to be performed.
- Provide applicable supporting documentation as required for each permit.
- Ensure the permit is signed by the applicant or a supervisor/company representative.

Once issued, the scope of the permit must not be changed. If the scope of work to be completed changes, then the existing permit shall be closed and a new permit should be applied.

A request can be made to extend a permit if the permit is still open, by contacting the Duty Wharf Supervisor. A closed permit WILL NOT be re-opened, a new request must be resubmitted.

3.3.1 Urgent After Hours Authorization

Where a permit is required due to urgent operational need outside normal business hours, the MWPA Duty Wharf Supervisor is to be contacted on (08) 9964 0510.

3.4 Issuing and Reviewing Permits

Prior to authorising the Permit, the Permit Authoriser (Duty Wharf Supervisor) will:

- Ensure that all permits are legible.
- Ensure that the scope, location and timing of work is clearly described on the permit.

- Review the applicants proposed safety and risk controls as identified on the permit and the Authoriser may request additional safety controls.
- Review the scope of work with the applicant to ensure a mutual understanding of what the work entails, the tools to be used and the work methods, the Permit Authoriser relies on the Applicant to understand the nature of the work and risk associated with it.
- Ensure that all supporting documentation as per the specific permit is submitted by the applicant when applying for a permit, including an approved JSEA and where required, a rescue plan.
- Check the work does not conflict with other work being undertaken at the time at any other location.
- Ensure that any other area of MWPA operations that may be impacted by the operation of a permit is notified prior to the work commencing.
- Be satisfied that the applicant has met all the requirements of this procedure and understands fully their responsibilities as the Applicant.
- Obtain signature of the Applicant.
- Authorise the permit.

3.5 Permit Planning and Administration

3.5.1 Permit Application and Authorisation

Permits shall be prepared and lodged by the permit holder initiating the work a minimum of 48 hours or two (2) business days prior to work commencing, unless work is an unscheduled activity, i.e. plant breakdown.

The scope of work specified by the Permit shall not be changed once the Permit has been authorised. If it is identified that the scope requires changing, then the Permit must be cancelled and a new permit raised.

A single permit shall not cover a number of tasks which are totally unrelated. If the tasks involve different sets of isolations, then separate permits are required for each task.

3.5.2 Application process

1. Obtain the relevant permit application from MWPA website www.midwestports.com.au (click on Health, Safety and Environment and then click on Permit System).
2. Lodge completed application with MWPA Duty Wharf Supervisor at least 48 hours before works (as per contract agreement) – However please also see point 3 below as some permits require extra time to process. Submit permit applications by email to permits@midwestports.com.au, or deliver in person.
3. Permits will be recorded in the Work Permit Register, then they will be sent internally to subject matter experts for their input on appropriate controls to put in place (if any). The subject matter experts are not all operational 24/7, if your permit requires sign off by a subject matter expert please submit it at least two (2) business days before you plan to start works to avoid delays.

4. The Permit application is to be signed by the relevant MWPA approval person and returned to the applicant prior to the work commencing.
5. The Permit is to be available on site at all times and must be presented upon request.
6. On completion of the works, contact is to be made to the Duty Wharf Supervisor to advise that the works are complete and to request the Permit be closed.

3.5.3 Work Permit Register

The Work Permit Register is maintained by the Wharf Supervisor and is used to track the status of the permit until the permit is closed.

3.5.4 Permit Board

The Work Permit Board is located in the Wharf Supervisors Office and is used to identify where permits are in use throughout the Port.

3.5.5 Permit to Work – Location of copies

The approved permit will be scanned and a copy sent to the requestor as well as other relevant parties. The original approved permit for jobs in progress will be kept on the Work Permit Board located in the Wharf Supervisors Office. A copy of the approved permit must be held at the job site and be available upon request.

3.5.6 Working under a Permit

Upon receiving the approved permit, the applicant must:

- Ensure that a hard copy of the Permit and other associated documents including a JSEA area readily available at the job site.
- Ensure that all persons engaged in the work have the necessary training, competence, qualifications and licences to carry out the work in a safe manner.
- Comply with the MWPA safety and security requirements.

Permits are only valid for the period specified and only while conditions remain unchanged. If conditions change significantly, the start of work is significantly delayed, or if work ceases for an extended period, then the Permit shall become invalid.

When the Permit expires before the end of the works, the Permit Authoriser may extend it by altering the expiry time and initialling the change and updating the Work Permit Register.

All permits are invalidated in the event of an emergency. All work must cease immediately and the work site must be left in a safe condition. All permits must be recharged and revalidated by the Permit Authoriser once the emergency is over and prior to work recommencing.

3.5.7 Permit Closure

When the work is complete, the permit closer shall ensure that all tags, temporary signage and barriers are removed and that the work site is left in a clean and safe condition. The permit holder will advise the Duty Wharf Supervisor of the completion of works so the permit can be closed. Should works have involved infrastructure alterations, "As Constructed" information will be required, this will be noted in the Work Permit Register and the Permit will be left open until this information has been received. The Permit Authoriser or designated

person may choose to do a final inspection of the job site, and when satisfied, sign off the Permit.

3.5.8 Withdrawal of a permit

Any breach of permit conditions shall be brought to the attention of the Duty Wharf Supervisor by the person witnessing the breach. On receiving a report of any breach, the Permit Applicant will immediately have work stopped until the situation can be assessed.

Failure to adhere to the conditions of the Permit shall result in closure of the Permit.

3.5.9 Permit audits

MWPA HSEQ team may audit the Permit to Work system from time to time. Project Managers or Supervisors can request to see a permit. Where a breach or non-compliance has been identified, the permit may be withdrawn.

3.5.10 Longer Term Permits

For routine work undertaken in the same manner on a regular basis, an application can be made for a longer term permit. Each application will be considered on its merits and where appropriate, additional conditions attached to ensure the risks are managed.

A safe operating procedure or other suitable document that describes how the company will ensure its workers comply with the long term permit (if approved) is required.

3.5.11 Fuel Discharge Infrastructure

Approval must be obtained before carrying out any work on equipment in a fuel tank area (for example; Fishing Boat Harbour (FBH) or Lease 1), a fuel riser pit (Berth 6), fuel pipelines, valve and/or pumps stations. For all Atom fuel infrastructure, a permit needs to be obtained from Atom. A MWPA permit is then required to overarch fuel company permits.

4.0 INTERNAL PERMITS

A permit is required for MWPA personnel for the following activities:

- Blasting
- Confined Space Written Authority
- Crane Lift
- Drone Operation
- Excavation/Penetration
- Hot Work
- Working at Height.

HSE-PRO-015/FRM01 Confined Space Written Authority Form is required when working within confined space at MWPA. The Duty Wharf Supervisor must be advised of the intended work before work commences.

5.0 DEFINITIONS

For the purposes of this procedure the following definitions apply.

Blasting - This permit covers abrasive, wet and hydro blasting. Abrasive is work on infrastructure, plant or equipment that involves using a stream of abrasive material, propelled at high speed by compressed air, water, steam, centrifugal wheels or paddles against a surface, to clean, abrade, etch or otherwise change the original appearance or condition of the surface. Hydro blasting is the use of a highly pressurised and focused stream of water, generally above 10,000 psi, comes from a water-blasting machine, which includes a pressure pump and special nozzles.

BHF Authority to Work Permit (non-routine) - Any non-routine work to be undertaken within the BHF area.

Confined Space Work – as per AS2865 Confined spaces definition i.e. any work in an enclosed or partially enclosed space which is not intended or designed primarily for human occupancy, within which there is a risk of one or more of the following:

- (a) An oxygen concentration outside the safe oxygen range.
- (b) A concentration of airborne contaminants that may cause impairment, loss of consciousness or asphyxiation.
- (c) A concentration of flammable airborne contaminant that may cause injury from fire or explosion.
- (d) Engulfment in a stored free-flowing solid or a rising level of liquid that may cause suffocation or drowning. [NB 'engulfment' is defined as *'the immersion or envelopment of a person by a solid or liquid (eg. grain, sand, and fertilizer) that is stored within the confined space.'*]

Examples of an enclosed or partially enclosed space would include storage tanks, process vessels, silos, other tank like compartments, pipes, sewers, ducts and similar structures, any ship board spaces entered through a small hatchway or entry point, cargo tanks, ballast and oil tanks.

Crane Lift - The operation of any shore or vessel based crane.

Drone - An unmanned aerial vehicle (UAV), known as a drone, is an aircraft without a human pilot aboard. The flight of UAVs may operate with various degrees of autonomy: either under remote control by a human operator or autonomously by on board computers. All drones identified for operation, regardless of size or class, will be required to operate in accordance with CASAs guidelines. (Refer HSE-PRO-025 Drone Operations over Port lands and waters)

Engine Immobilisation - For ships at anchor or moored in the harbour which intend to immobilise their main engine for any period of time.

Excavation/Penetration - Any work assigned on any MWPA operations lease involving excavation or penetrating activities. This includes all penetrations of floors, wall, roofs and ceilings regardless of depth.

Explosive Substances - For all vessels handling or carrying explosives at the Port, explosive substances are governed by the Dangerous Goods Safety (Explosives) Regulations 2007 which is supported by AS 3846—2005: The handling and transport of dangerous cargoes in Port area.

Fuel Transfer (Bunkering) - Transfers of bulk petroleum products (e.g. fuels and oils).

Fumigation – Any fumigation of a grain vessel, including in-transit fumigation of cargo.

Hot Work – Work involving welding, thermal or oxygen cutting, heating and other fire producing or spark producing operations that may increase the risk of fire or explosion.

Job Safety Environment Analysis (JSEA) – a written description of the task which outlines the steps in the task and the safety and environmental controls and precautions that will be implemented. For the purpose of this procedure a description of the job with appropriate controls may be a JSEA, risk assessment, safe work practice or other similar document.

Non-routine or Hazardous Task – a task undertaken for the first time, a task infrequently undertaken or a task with inherent hazards or risks that has the potential for a safety or environmental impact or incident.

Permit – a document authorising a person to undertake specific work in a designated area.

Permit Authoriser – a MWPA employee who is authorised to issue a permit.

Permit Approver – a MWPA representative who is authorised to approve a permit.

Permit Applicant – a person/company who is undertaking work who requires authorisation. The applicant completes the Permit form and is required to comply with MWPA's Permit to Work System.

Permit to Work system – the system where permits are required, completed and authorised.

Work Afloat and Diving – Diving: Any work involving divers using self-contained breathing equipment, surface supplied air system or snorkel, mask and fins type equipment.

Work Afloat: Any work undertaken over water from a vessel, pontoon, barge, floating platform or other – Please refer to Section 3.3 for further clarification of permit requirements.

Works in the MWPA Rail Corridor - Any work undertaken within three (3) metres of, above, or on a rail line within the rail terminal (i.e. excludes ship loader rail tracks) or within the fenced rail corridor.

6.0 ASSOCIATED DOCUMENTS

HSE-PRO-032/FRM01 Application to Excavate/Penetrates Permit
HSE-PRO-032/FRM02 Application for Hot Work Permit
HSE-PRO-032/FRM03 Application for Confined Space Permit
HSE-PRO-032/FRM04 Application for Blasting Permit
HSE-PRO-032/FRM05 Application for Land Based Crane Lift Permit
HSE-PRO-032/FRM06 Application for Works in the MWPA Rail Corridor Permit
HSE-PRO-032/FRM07 Work Afloat and Dive Permit
HSE-PRO-032/FRM08 BHF Authority to Work Permit (Non-Routine)
HSE-PRO-032/FRM09 Chute Entry Permit - BHF Berths 4 & 5
HSE-PRO-032/FRM10 Application for Working at Heights
HSE-PRO-032/FRM11 Permission to Immobilise Permit
HSE-PRO-032/FRM12 Drone Operations Permit
MWPA Wharf Specification Booklet
Work Permit Register
HSE-PRO-015/FRM01 Confined Space Written Authority Form
HSE-PRO-025 Drone Operations over Port lands and waters
MAR-SWP-007/FRM01 Fuel Transfer (bunkering) Permit
HSE-PRO-035/FRM01 Application to Fumigate Permit
HSE-PRO-018/FRM01 Application for Traffic Management Permit
HSE-PRO-026/FRM01 Explosive Substances Permit

7.0 REFERENCES

AS 2865 Confined spaces
AS 3846 The handling and transport of dangerous cargoes in port areas
Dangerous Goods Safety (Explosives) Regulations 2007
Mines Safety and Inspection Act 1994 and Regulations 1995
Occupational Safety and Health Act 1984 and Regulations 1996
Port Authorities Act 1999
Rail Safety National Law (WA) Act 2015 and Regulations 2015.

8.0 ADMINISTRATION

Custodian: HSEQ Manager

Approval: Vickie Williams
General Manager – Workforce Development and Safety

Date: 04 August 2018