Risk Management Procedure

WNH Q14 - Revision 3.0

Effective from October 2025

	CONSEQUENCE (Impact) Refer below					
LIKELIHOOD Refer Below	1. Insignificant	2. Minor	3. Moderate	4. Major	5. Extreme	6. Catastrophic
7. Almost certain 91-100%	7	14	21	28	35	42
6. Likely 61-90%	6	12	18	24	30	36
5. Possible 21-60%	5	10	15			
4. Unlikely 6-20%	4	8	12			
3. Rare 1-5%	3	6	9			
2. Extremely rare <1%	2	4	6			

Revision History

Rev	Reason for Revision	Date	Prepared	Reviewed	Approved
1	Initial release	21/10/2018	Robert Barbour	Chris Sims	Steven Ross
2	General review and update	06/2023	Alistair Mason	Chris Sims	Steven Ross
3	General review and update	10/2025	Alistair Mason	Robert Barbour	Robert Barbour (GM Delegate)

Contents

1.0 This Document

1.1 Purpose

This procedure is designed to outline the risk management expectations of Woolnorth Renewables (WNR) and provide framework and decision-making tools for all Health, Safety and Environmental (HSE) aspects of the business. The Risk Assessment & Calculation section has also been designed to support the analysis of risk in broader areas of the business. Correct use of this procedure will ensure that HSE risks are minimised As Far As Reasonably Practicable (AFARP) in the procurement, planning, operations, monitoring, and review of WNR activities.

1.2 Scope

The procedure applies to all aspects of the WNR business, any worksite managed by WNR, and any personnel engaged or invited by WNR to conduct activities on their behalf.

2.0 HSE Risk Management

2.1 Overview

Health, Safety and Environmental (HSE) risk management shall be undertaken at all levels of Woolnorth Renewables (WNR), but specifically, at the business, site and individual-task levels. The core focus of all risk management shall be to **eliminate** HSE risks As Far As Reasonably Practicable (AFARP). If it is not reasonably practicable to eliminate such risks, then best endeavors shall be undertaken to **minimise** them AFARP. This shall be achieved by adopting the following steps,

1) **identify the hazards** that are significant to the activity,
2) calculate their significance using a likelihood and consequence matrix (**risk assessment**),
3) **outline the controls** that shall be put in place for the duration of the activity, and,
4) ensure these steps are **documented**.

The adoption of HSE risk management at all levels of business recognises the legislative requirements, including duty of care, of all levels of the Woolnorth Renewables business (PCBU) including the Board of Directors, General Manager, Senior Leadership team, Advisors, Engineers and Workers. This procedure has also been developed to address the amendment to the Tasmanian WHS Act relating to industrial manslaughter and the increased criminal liability for gross negligence leading to worker death.

3.0 Assessing the Hazards

3.1 Outline the Job Steps

The initial steps required for the identification of hazards associated with any aspect of the business, shall start with the outlining of work activities. Examples of activities include:

- maintaining brush gear on a generator;
- removal of vegetation; and
- major equipment overhaul; etc.

These activities will be clearly outlined in the scope of works or the project description.

3.2 Outline the Hazards for Each Job Step

Each step of the activity may have one or more distinct hazards associated with it. Identifying those Hazards requires personnel to find those things or think about those situations where there is a potential for harm to be caused to people, property or the environment. Hazards will generally be associated with:

- the physical work environment;
- the equipment, materials or substances being used;
- the design and management of the worksite; or
- sources of hazardous energy.

Hazards can be identified through:

- worksite inspections;
- consultation with other workers or subject matter experts; and
- reviewing documentation such as previous risk assessments, manufacturer's manuals or Safety Data Sheets (SDS).

Environmental Hazards (Aspects) should also consider a life cycle perspective where possible along with risks and opportunities. Environmental opportunities may also be addressed at the business level, as well as during the annual operational risk review workshops.

KEY POINT - when assessing the hazards associated with a job or activity it is important that only those that are *significant* to that being assessed are outlined. If trivial or every possible concern is included it becomes a distraction from the important points, and therefore a hazard in itself.

4.0 Risk Assessment & Calculation

4.1 Overview

The risk is the potential result of the exposure to a hazard. It is calculated by assessing the likelihood of exposure and the possible resultant impact or consequence. The final risk rating is calculated using a matrix system. The tables and matrix outlined in Table 1 shall be used in all risk assessment calculations. The risk assessment shall be documented. This may be done in a Take 5, Risk Register, JHA or a SWMS depending on the level of risk assessment being undertaken. The initial risk level will then be used to determine what additional documentation will be required for the implementation of suitable controls (e.g. low risk may only use a Take 5 whereas high risk will require a SWMS).

For moderate or higher risk hazards requiring the completion of a JHA, both uncontrolled and controlled risk scores are to be calculated. Uncontrolled risks assessment refers to the calculation of risk prior to the controls that are to be put in place, while the controlled (residual) risk reflects the improvements put in place through the implementation of the controls.

Authorisation for works to take place by the site supervisor or managing personnel, through the signing-off of risk management documentation, is mandatory when any job step or activities is identified as having a controlled risk of moderate or above. Work identified as high risk shall be authorised by the General Manager.

KEY POINT - Risk calculations need to consider the worst *credible* consequences of a hazard, and not the worst *possible* consequence. When assessing the risks of climbing a 70m internal tower ladder where the hazard is a fall from heights, for example, the most credible consequence of such a fall is suspension trauma or soft tissue damage, and not death. This is based on the fact there is an expectation that all controls identified in the risk assessment will be implemented and should still be effective at preventing the worst *possible* scenario, even if some of the controls fail.

Table 1 a, b and c. Risk assessment tables provided for the rating of risk based on likelihood and consequences of a hazard or impact taking place.

	CONSEQUENCE (Impact) Refer below					
LIKELIHOOD Refer Below	**1. Insignificant**	**2. Minor**	**3. Moderate**	**4. Major**	**5. Extreme**	**6. Catastrophic**
7. Almost certain 91-100%	7	14	21	28	35	42
6. Likely 61-90%	6	12	18	24	30	36
5. Possible 21-60%	5	10	15	20	25	30
4. Unlikely 6-20%	4	8	12	16	20	24
3. Rare 1-5%	3	6	9	12	15	18
2. Extremely rare <1%	2	4	6	8	10	12
Risk Level	**Low**		**Moderate**	**High**		**Extreme**

Table 1b.

CONSEQUENCE (impact) - The most likely result of contact with the hazard						
	Health & Safety	Natural Environment	Community	Legal and Compliance	Annual Budget / Financial Loss	Operational/Asset
6. Catastrophic	One or more fatalities. Injury, illness or disease resulting in deaths. Regulatory investigations show inability to safely continue operations with existing structure and/or processes. Business processes and operational activities are altered.	Serious environmental harm causing a significant impact on regional population or ecosystem with eventual recovery impossible. Business processes and operational activities are altered. Regulatory reporting required, intervention required.	Irreversible damage to sites, landscapes or artefacts of very significant community value. Devastating impacts. No authorisation for the activity.	A breach resulting in penalties and jail terms for employees or the Board. Regulator imposed constraints or enforcement proceedings that will directly impact business operations and ability to meet strategic objectives. Restrictions or loss of business level licences or authorisations. Multiple staff termination considered.	25% over business approved opex or capex budget, or financial loss of > $25M	Loss of >4 turbines through major damage as an uninsurable event, or, the site is offline for, BPWF - > 670 days SBWF - > 352 days MRWF - > 150 days
5. Extreme	Severe injury, permanent incapacitation to one or more persons. Lost time >90 days with potential for injured worker/s not to return to full pre-injury duties. Investigations determines that significant changes should be made to our business processes.	Serious environmental harm causing concerning impacts to local ecosystem or populations. Ecosystem/population numbers likely to recover, but not necessarily to the same pre-incident conditions. Regulatory report required, intervention likely.	Potentially irreversible impacts to sites, landscapes or artefacts of significant community value. Long term impacts. No authorisation for the activity.	Legal, regulatory or contractual compliance breach with certain prosecution and penalties likely. Regulator imposed constraints or enforcement proceedings which may impede business operations and ability to meet strategic objectives. Staff termination considered.	15% over business approved opex or capex budget, or financial loss of $15M - $25M	Loss of 3-4 turbines through major damage as an uninsurable event, or, the site is offline for, BPWF - 400-670 days SBWF - 220-352 days MRWF - 90-150 days
4. Major	Severe injury, with temporary incapacitation. Lost time 5-90 days with high potential for injured worker to return to full pre-injury duties. Investigations determines that changes should be made to our business processes. Near-miss with potential for significant harm to people.	Material environmental harm, such as population/ecosystem impact with no residual effects likely after follow up. Regulatory intervention possible.	Major damage to sites, landscapes or artefacts of significant community value. Longer term impacts. No authorisation for the activity or works falling outside scope of authorisation.	Legal, regulatory or contractual breach with probable prosecution or penalties. Regulator imposes constraints or enforcement proceedings that restrict the business. Staff termination or formal notification considered.	5% over business approved opex or capex budget, or financial loss of $1M - $15M	Loss of an individual turbine through major damage as an uninsurable event, or, the site is offline for, BPWF - 30-400 days SBWF - 15-220 days MRWF - 6-90 days SBWF/MRWF V90 individual turbine offline for 1–5 yrs

Table 1b Cont.

CONSEQUENCE (impact) - The most likely result of contact with the hazard						
	Health & Safety	Natural Environment	Community	Legal and Compliance	Annual Budget / Financial Loss	Operational/Asset
3. Moderate	Serious injury with anticipated full recovery. Lost time <5 working days. Investigation determines significant opportunities for improvement and changes to business processes or equipment. Near-miss with potential for serious harm to people.	Environmental harm resulting in environmental nuisance or possible material environment harm. Ecosystem/population numbers not impacted. Regulatory report required, no intervention.	Considerable damage to sites, landscapes or artefacts of significant community value. Medium term impacts that are rectifiable with substantial cost/effort. No specific authorisation for the activity.	Legal, regulatory or contractual breach with possible prosecution or penalties. Regulator may monitor business activities. Major system changes needed.	2% over business approved opex or capex budget, or financial loss of $200K - $1M	The site is offline for, BPWF – 6-30 days SBWF – 3-15 days MRWF – 2-6 days SBWF/MRWF V90 individual turbine offline for 75-352 days
2. Minor	Medical treatment injury with no long-term impact on health or wellbeing. Investigation determines minor opportunities for improvement, but no material business process changes required. Near-miss with potential for minimal harm to people.	Possible environmental harm or an environmental nuisance. Local impact on flora and fauna that is minimal with limited consequences. No Regulatory reporting required. Internal reporting only.	Damage to sites, landscapes or artefacts of community value. Short term and rectifiable impacts. Activity falls outside specific scope of authorisation.	Minor breach of contractual obligations, legal, regulatory or internal policy failure. May require explanation but no penalty or censure, prosecution unlikely. System changes needed.	1% over business approved opex or capex budget, or financial loss of $10K - $200K	The site is offline for, BPWF – 8hrs -6 days SBWF – 4hrs - 3 days MRWF – 2hrs – 2 days SBWF/MRWF V90 individual turbine offline for 10-200 days
1. Insignificant	First-aid treatment. Incident resolved by routine management activities. Near-miss with no potential for harm to people.	Negligible, or no environmental harm. Possible incidental impact on flora and fauna with minimal to no known consequences. Internal reporting only.	Near miss or process failure that could have led to damage to sites, landscapes or artefacts of community value.	Low-level compliance issue dealt with in-house. Negligible legal or contractual impact. Possible system review needed.	<1% over business approved opex or capex budget, or financial loss of < $10K	Individual turbines offline for, BPWF V66 - <10 days SBWF/MRWF V90 - <4 days

Table 1c.

LIKELIHOOD - The probability that the identified consequence will occur, taking into account proximity and exposure to the hazard	
7. Almost certain	Over 90% probability, ***or*** 'Happens Often', ***or*** Could occur within 'days to weeks'
6. Likely	60% to 90% probability, ***or*** 'Could easily happen', ***or*** Could occur within 'weeks to months'
5. Possible	20% to 60% probability, ***or*** 'Could happen has occurred before', ***or*** Could occur 'within a year or so'
4. Unlikely	5% to 20% probability, ***or*** 'Hasn't happened yet but could,' ***or*** Could occur 'after several years'
3. Rare	1% to 5% probability, ***or*** Conceivable, but only in extreme circumstances,
2. Extremely rare	Less than 1% probability, ***or*** Conceivable, but only in exceptionally extreme circumstances

5.0 Identifying Controls

5.1 Overview

The Hierarchy of Control (Figure 1) shall be used as the model for identifying suitable control measures to manage identified risks. Wherever practicable, all risks shall be eliminated completely, but where this is not practicable, the control levels identified in this hierarchy will be considered in descending order. The controls identified must reduce the risk AFARP.

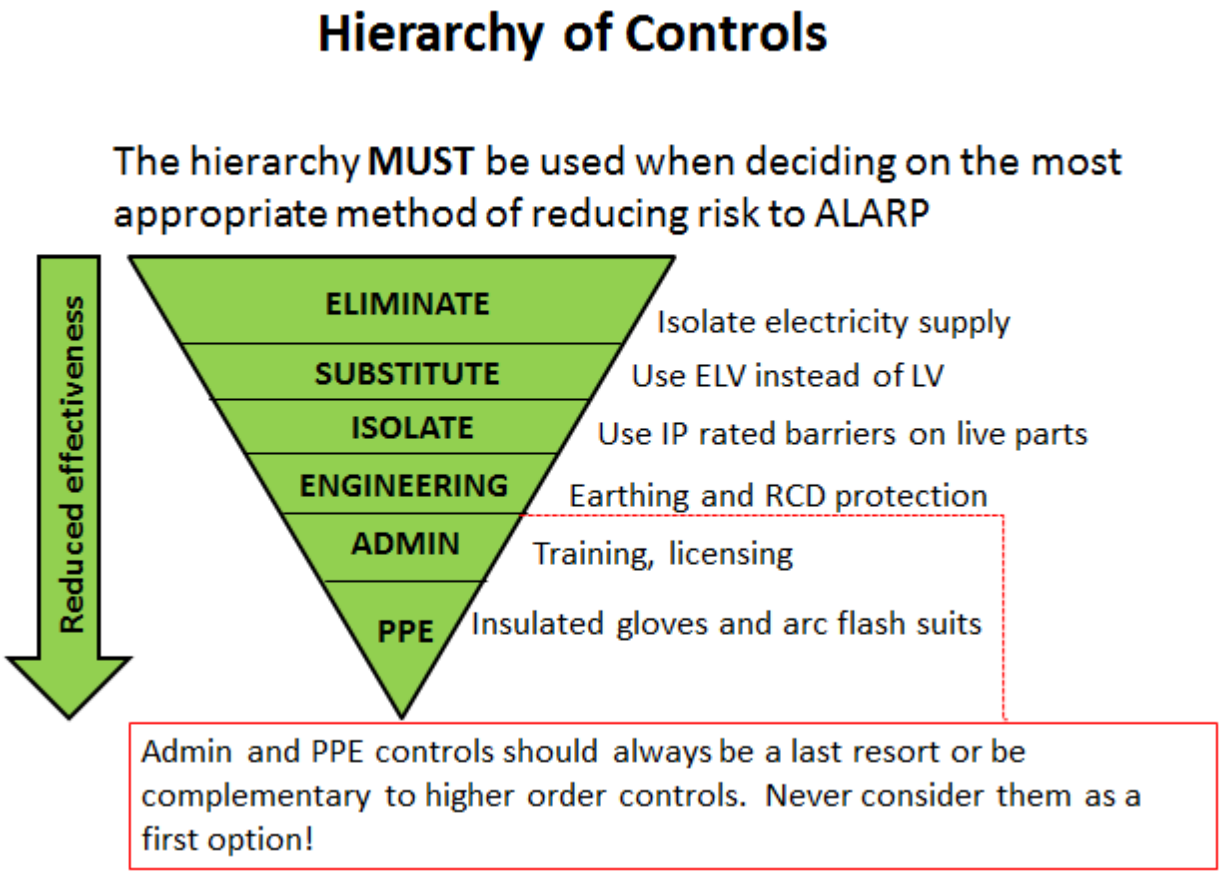

Figure 1: Hierarchy of Control

An example of appropriate use of the Hierarchy of Controls is provided below. In this example the task being considered is the repair and testing of electrical equipment inside a switchboard. The identified hazard is electricity, and the risk is electrocution or arc flash. The process for deciding on the appropriate control would be:

1. Eliminate – remove all sources of energy that enter the work space or equipment;

2. Substitute – design the equipment to operate at extra low voltage (non-lethal) rather than low voltage;

3. Isolate – place an insulated barrier between the work area and any exposed live parts to prevent accidental contact;

4. Engineering – install residual current devices (RCD's) on all circuits to ensure any current flow resulting from contact is reduced to non-lethal levels;

5. Administrative – ensure Workers are licensed, trained and have suitable safe work procedures available; and

6. Personal Protective Equipment (PPE) – use insulated gloves and flame retardant clothing

When considering the appropriate controls, "soft controls" (Admin and PPE) shall only be considered in isolation, as a last resort. It is preferable that soft controls are used in conjunction with those outlined higher in the hierarchy as a method of further reducing risk levels.

6.0 Corporate HSE Risk Management

6.1 Overview

Health, Safety and Environmental risk management at a corporate level is conducted for a number of reasons. Firstly, it promotes the opportunity for top-down cultural influence and assist managers in ensuring engagement by all personnel in the business's HSE priorities are maximized. It also provides an objective perspective on operational risk management that is typically managed by operational staff, as well as the opportunity for systems and documents to be developed to support those staff. Corporate HSE risk management within WNR is conducted at the business and site (wind farm and associated transmission line) levels.

6.2 Business-level

Risk management at this level forms the basis for strategic risk reviews that address the entire "foot-print" of the business. Two documents will contribute to HSE risk management at this level, these being the Corporate HSE risk register and the HSE management plan. The register will assess operational activities, but in a broad sense, looking at topics such as working at heights within wind turbines. This assessment would not, for example, address the climbing of the internal ladder of wind turbine A06 at Musselroe Wind Farm to conduct a specific activity, which would normally be covered by a JHA or SWMS. The HSE management plan, on the other hand, provides an overview of the HSE system and how it is to be used, the resources that have contributed to developing the plan, and how the business complies with relevant legislation, certifications and its duty of care to the business's personnel. Both these documents will outline hazards at a broad level, the controls that are in place to manage the hazards and impacts that are identified, and focus on documents, training and systems as control measures e.g. Wind Turbine Access Procedure and Working at Heights qualifications.

6.3 Site-level

The site-based risk management will typically be represented by a site risk register that captures the hazards and concerns for a particular wind farm and its associated transmission line and property. This register will also outline the controls that are in place for each item which will typically be as management plans or infrastructure descriptions (e.g. fall arrest system specific to the site). The site risk register should be reviewed when preparing operational risk management documents such as JHAs and SWMSs.

7.0 Operational/Task Risk Management

7.1 General

Operational risk management documents are amongst the most important for managing HSE hazards and impacts, as they provide the majority of technical detail required to ensure an activity is managed safely and without impact. They can, however, also be the least up-to-date, suffering from lack of review following alterations to work methods or conditions that happen through the course of time. The root cause of such poor document control is typically inadequate allocation of time, due to the demands associated with job completion. For this reason, it is vital that operational risk assessments are addressed and reviewed well in advance of the starting point of a job. This review phase must include a number of people that are experienced in the activity (i.e. it is peer reviewed). The process-steps for all operational risk management is outlined in Figure 1 and further described below.

7.2 A PIC or PM Must be Assigned for any Activity

The responsibility for the decision on how the risk management for an activity will be documented falls entirely with the manager/coordinator/organiser of that activity. This person is defined as either the Project Manager (PM) or Person In Charge (PIC) depending on the degree of planning and complexity of the task. While a PM will generally be assigned for any larger, more complex activities, such as a whole site outage, the assignment of a PIC would be adequate for more routine operational activities such as the investigation of a WTG breakdown. In all cases however, a PIC shall be defined for the management of the operational work, resulting in larger projects having both a PM and a PIC. In addition, the role of the PIC may be fulfilled by differing personnel throughout the project, whereas the PM role will be maintained by the same person.

For larger or collaborative projects that require two or more PIC roles, clear written delineation of the responsibilities of these personnel and the PM shall be produced. This delineation shall be produced in the planning phase of the project using the HSE Risk Management Checklist (WNH Q14.1) and will ensure a handover processes is adhered to. The appointment of a PIC shall be based on competency and experience rather than company hierarchy.

In addition to the documentation of risk management, the PIC/PM is responsible for all aspects of HSE management for the activity, including the operational risks. The defining of the PIC/PM during the planning phase of an activity is therefore imperative to ensure that hazards are identified as early as possible and to allow the appropriate controls to be put in place for the duration of the activity.

The role of the PIC/PM for operational activities can be broad. These personnel shall be responsible for the general direction, coordination and oversight of all aspects of the activity, and include:

1) confirming and monitoring safe access to WNR owned and operated work sites;
2) deciding when particular contractors or phases of work can commence, and when it is necessary to suspend a process;
3) coordinating simultaneous activities by providing reasonable instruction and coordination for work associated with one process so as not to endanger persons engaged in another process;
4) issuing prompt directions necessary to safeguard site personnel and/or the general public from harm on becoming aware of an unsafe condition, work practice or situation; and

5) monitoring the general conduct of work for compliance with the activity's HSE risk management documents.

7.3 Risk Management Must be Documented

Risk management must be initiated during the planning phase of any activity. This may be for a one-off task performed by an individual such as servicing a machine, replacing building gutters or painting a wall, through to multi-team projects that span extended periods of time, or for the procurement of new componentry/substances to be stored on site. In all cases risk management must be documented.

Two exceptions exist to the documentation of risk management. The first being for staff completing routine daily activities that are low risk e.g. office work, asset inspections, general site movement and short duration low risk technical work. This exception exists due to the extent of documentation already on file for their training, competency, experience, supervision and familiarisation with their worksite hazards. The second exception is for contractors conducting regular, low risk, short duration work e.g. delivery drivers, meter readers and waste collection services.

In all cases, contractors shall have their risk management documentation in place before commencing work on a WNR worksite (noting the above exception). It is the responsibility of the specific contractor's WNR representative or job manager to ensure this documentation is collected and that any exceptions/exemptions are appropriate. This requirement for contractors is to ensure that WNR has evidence to demonstrate these personnel are familiar with the risks within the WNR worksite they plan to operate in.

There are a number of options available to ensure that work activities are covered by documented risk management. These options include pre-written generic documents such as company procedures, tooling instructions, work instructions or Work Safe Tasmania codes of practice. When pre-written documents do not exist or do not accurately reflect the planned activities, then documents written specifically for the activity shall be written. These shall typically take the form of written Take 5 assessments, Job Hazard Analyses (JHA) or Safe Work Method Statements (SWMS, see Figure 1). Due to the fact that generic documents rarely have risk assessments that are specific to the task, a combination of document types will typically be required e.g. a JHA for a wind turbine blade bearing change would also have the relevant work instruction, WNR Wind Turbine Access Procedure and the lift study from the crane contractor attached or referenced. Fundamentally, the true test of the adequacy of the documented risk management is that it accurately reflects the job steps and hazards on the day of the activity.

Particular attention to documented risk management shall be taken for new, complex or higher risk activities. Examples of these include, respectively;

- a decision to use a boom lift man bucket rather than the traditionally used crane lift man bucket for blade repairs,
- a planned outage involving work groups in different parts of a switchyard doing different tasks, and,
- a major component replacement in a wind turbine.

To assist with the preparation and review of risk management documentation the HSE Risk Management Checklist (WNH Q14.1) should be utilised. This checklist shall be completed for new, complex or higher risk activities. Any uncertainty during this phase must be addressed with a WNR HSE representative.

7.4 Identify the Work Activities

Clearly outline the scope of the work as a project title or name, and for larger or higher risk projects, provide a written summary of the project. Examples of project titles are,

- Replacement of failed underground cable joint;
- Slashing of vegetation along transmission line; and
- Wind turbine blade bearing replacement;

Following this, outline the sequential steps involved in completing the entire job. These steps should be at a level which is meaningful to enable appropriate management of the risks. Examples of job steps respectively are,

- Work site preparation, job and risk management communication, excavation of buried joint, removal of damaged joint, cable preparation and cleaning, installation of new joints, cable testing, backfilling and rehabilitation.
- Mobilisation to site, work site preparation, personnel and landowner debrief, slasher operations, demobilisation and cleanup; and
- equipment movement into nacelle, loosening blade retaining bolts in nose cone, working in nacelle to install turning gear, blade removal, bearing change and replacement of blade, re-assemble turbine and demobilise gear.

7.5 Identify the Hazards and Impacts

Each step of the work activity may have one or more distinct hazards or impacts associated with it. Identifying those hazards requires workers to find those things or think about those situations where there is a potential for harm to be caused to people, property, or the environment. Hazards will generally be associated with:

- the physical work environment;
- the equipment, materials or substances being used;
- the design and management of the worksite; or
- sources of hazardous energy.

Hazards can be identified through:

- worksite inspections;
- consultation with other workers or subject matter experts; and
- reviewing documentation such as previous risk assessments, manufacturer's manuals, or Safety Data Sheets (SDSs), and site risk registers.

Environmental impacts should also consider a life cycle perspective where possible, along with risks and opportunities.

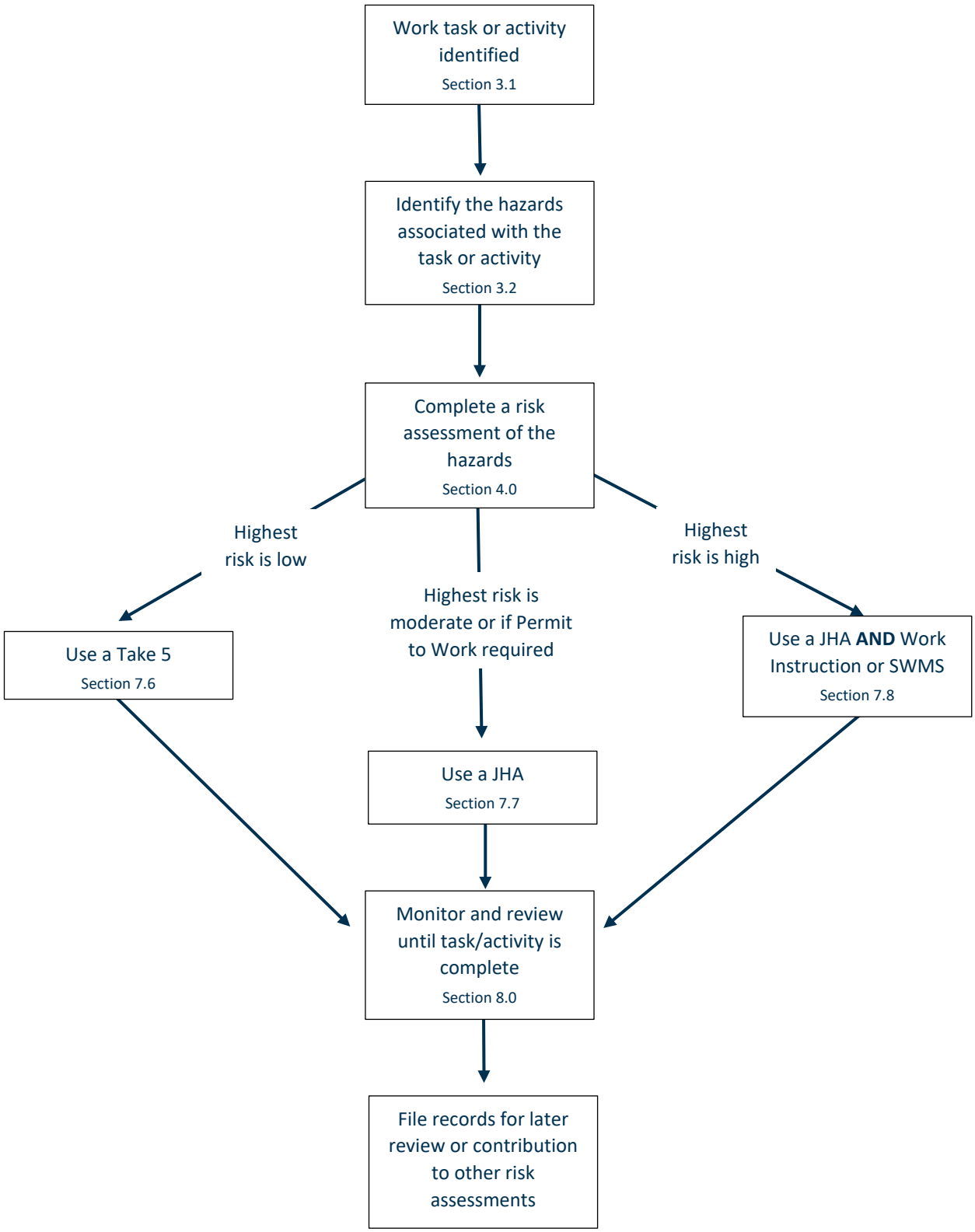

Figure 2. Process for operational risk management

7.6 Take 5 Assessments

The Take 5 is a base-level hazard identification and risk assessment tool that can be completed either mentally or as a documented process. It is typically used to undertake an initial assessment of hazard and risk levels in order to determine if a JHA and/or SWMS may be required. It can also be used to document the risk management process for small tasks with low risk levels. Take 5s can be completed by any member of the workgroup as long as all members review the final product. There must be at least one completed where no other risk management documentation has been completed (noting the above exceptions in Section 7.3). The steps required to complete a documented Take 5 assessment are outlined below. It is expected that the mental process would also reflect this approach. The choice to use just a mental calculation would need to be defensible and logical amongst your colleagues and managers (i.e. was it really low risk, uncomplicated and routine-type work – see exceptions in Section 7.3).

Step 1 – Identify the Hazards

Prior to commencing a work-related task, consider what job steps are required to complete the task and check the work area for hazards associated with those job steps.

Step 2 – Complete the Take 5 Checklist

Complete each step on the checklist and document the hazards. Determine the Risk Levels of each of the required job steps and record the highest risk Level in Section 3 of the checklist. If the Risk Level is above Low, the work cannot proceed using the Take 5 alone and will require a JHA and / or SWMS as well.

Step 3 – List the Control Measures

If the highest identified Risk Level is Low, then the work can proceed using only a Take 5. The Controls that will be implemented to control the Risk Level shall be documented on the Take 5 checklist.

Step 4 – Communicate the Control Measures

Once the assessment process and checklist are complete, clearly communicate all of the control measures to the workgroup prior to commencing work and ensure that every member of the workgroup understands what is required to implement and work to the controls.

Step 5 – Monitor and Review

The work can commence, however as work progresses if any new hazards are identified, the work environment changes or there is a change to the work scope, the Take 5 must be re-assessed to ensure that the listed control measures are still adequate to keep the risk level low.

7.7 Job Hazard Analyses

A JHA is completed by following the steps below and documenting the required information using WNH Q14.3 Job Hazard Analysis Template. A JHA shall be completed if the Highest identified risk is moderate or if a Permit to Work is required for the job.

Step 1 - Determine the Job Steps

Break the job into its components - what are the individual activities?

- Each step should accomplish a specific outcome. Each step should be a natural progression into the next; and
- record steps in the Job Steps column of the template in the order that you will complete the steps.

Step 2 - Identify the Hazards

Identify and describe the hazards associated with each job step, taking into account:

- Safety to people - 'We put peoples safety first' includes workers, visitors, clients, contractors and members of the public;
- Protection of the environment – including prevention of pollution, preventing spread of weeds and diseases, managing cultural heritage, managing stakeholder concerns and complying with all environmental, legal and permit requirements;
- Safety of plant - safety of WNR generating and transmission assets and associated equipment and of our stakeholder and client assets and work environments;
- Production and continuity of supply - WNR electricity production and supply, client production and supply of product; and
- Workgroup management – consider safe working hours, travel times and distances, fatigue and billable hours of workers, clients and contractors.

Step 3 - Assess the Uncontrolled Risk Level

For each hazard assess the risk level before any controls are put in place. This is the inherent or uncontrolled risk.

Consider the:

- likelihood of the hazard occurring over the course of the works; and
- consequence of the hazard occurring, considering impacts to people's health and safety, the natural environment and to social and / or Cultural Heritage values.

Step 4 – List Risk Control Measures

- Identify suitable control measures that will be put in place to eliminate the hazards or reduce the risks (e.g. following relevant HSE processes);
- apply control measures to minimise risk as AFARP; and
- record these control measures in column

Step 5 - Assess the Controlled (Residual) Risk Levels

For each hazard, assess the residual risk level with the controls in place. A key point to assist in calculating risk is to conduct the assessment considering the most reasonable or credible outcomes that may arise based on the control measures that are in place, rather than highly unlikely "freak" events. For example, the most credible consequence of someone falling while climbing a ladder within a wind turbine if they have the appropriate training, experience, and are attached to the fall arrest system with an appropriate harness and connection equipment, would be just minor injuries requiring first aid, and not death or serious injury due to all of the controls being ignored or ineffective.

Step 6 – JHA Completion and Approval

Once the JHA has been completed, all members of the Workgroup doing the work sign the completed template to record that they have reviewed and understood the JHA, before starting work.

The JHA may then require approval, depending on the level of residual risk:

• Low: PIC/PM

• Moderate: Site Supervisor/Manager

• High: Manager Once Removed/General Manager

Step 7 – Document Storage

The JHA is kept with the work party while the work it describes is being performed. The JHA is constantly reviewed and updated to reflect any changes in activities, hazards, risks or controls made during the work period, by for example, pen annotations on printed copies. If the JHA that is developed relates to a repetitive or routine task, it may be used by others completing the same task in the future. Therefore, the annotated JHA should be kept to update any pre-written JHAs stored with the document management system.

7.8 Safe Work Method Statements

A Safe Work Method Statement (SWMS) is a documented Health and Safety Risk Management Plan required for high-risk work Activities. A SWMS, or an equivalent document such as a work instruction, is mandatory for any tasks that involve High Risk Construction Work as per the Work Health and Safety Regulations 2023.

A SWMS sets out:

- the individual tasks within the work activity - in a logical sequence;
- identifies the hazards; and
- describes the Control Measures.
- It is a detailed description of how a specific task is to be performed.

A SWMS differs from a JHA in that:

- it is mandatory for work activities that meet the definition of High Risk Construction work,
- it requires a higher level of detail as to how each specific risk will be managed, either containing the step-by-step instructions to perform the work safely, or, referencing other documents that contain this level of detail.

It requires that the risks and controls have been discussed with the workgroup, and that these discussions have been documented.

A SWMS will be required for the following defined activities:

- Risk of falls from greater than 2 metres;
- work on a telecommunications tower;
- demolition of load-bearing structure;
- likely to involve disturbing asbestos*;
- temporary load-bearing support structures;
- work in confined spaces;

- work in or near shaft or trench with an excavated depth greater than 1.5m or in a tunnel;
- use of Explosives;
- work on or near pressurised gas pipes or mains;
- work on or near chemical, fuel or refrigerant lines;
- work on or near energised electrical installations or services;
- work in an area with contaminated or flammable atmosphere;
- work with tilt up or pre-cast concrete;
- work on, in or adjacent to road, rail shipping or other major traffic corridor;
- work in an area with movement of powered mobile plant;
- work in or areas with artificial extremes of temperature;
- work in or near water involving a drowning Risk; and
- Diving work.

To complete a Safe Work Method Statement (SWMS), follow the template provided in WNH Q14.4 Safe Work Method Statement Template. Consult with others throughout the SWMS process. Affected workers, experienced supervisors and relevant technical experts are consulted throughout the development of the SWMS and this consultation is to be documented in the Template.

Step 1 – Describe the Work Activity

- Identify all of the high risk work activities involved in the job - use the checklist provided on the template;
- describe each high risk work activity in enough detail to properly identify all the associated hazards and no activities with the potential to cause accidents are left out; then
- break each high risk work activity into its component tasks or job steps and, for each step, describe the environment where the task should be undertaken.

Step 2 – Identify the resources required to perform each task

All aspects of the work can contribute HSE risks, so everything is assessed and consider:

- the resources and materials to be used;
- the manpower and equipment required;
- the work location and Worksite constraints;
- the skills, competencies and training of the Workers; and
- any other contributing Aspects.

Step 3 – Identify the health and safety risks associated with each task

Perform a risk assessment for each component of the work activity, specify the hazards relating these components, and score the risks to health and safety.

Step 4 – Develop and document appropriate control measures

- Describe the control measures to be implemented to mitigate the risks;
- describe how each control will be implemented. Be specific, e.g. specify the Personal Protective Equipment (PPE) to be worn while doing the task; and
- include the required processes to manage and dispose of hazardous waste (see WNH Q21 Working with Hazardous Materials & Substances Procedure;
- provide clear instructions for undertaking the task in a safe manner, such as:
- how relevant Workers are made aware of the risks, control requirements and the precautions to be undertaken before starting the task;
- what to do in case of emergency (reference any relevant emergency procedures and workers);
- what measures are in place to ensure work is carried out following the SWMS, and what to do if a breach of the SWMS requirements is identified; and
- include instructions to ensure that the work area is left safe for others to use.

Step 5 – SWMS review and approval

The SWMS is reviewed by the Line Manager responsible for the work. The Line Manager:

- reviews the hazards and risks and ensures they have been accurately identified;
- reviews the risk controls and ensures they are adequate; and
- when satisfied that the risk controls are appropriate, approves and signs the SWMS.

Note: The SWMS must be signed by the Line Manager before work starts.

Step 6 – Store the SWMS

If the SWMS that is developed relates to a repetitive or routine task, it may be able to be used by others completing the same task in the future. Therefore, the SWMS can be lodged with a document management system such as SharePoint for later use.

8.0 Risk Management Reviews

8.1 Overview

At all levels of risk management, whether it be at the whole business, site or operational, reviews and updates of documented controls shall be conducted to ensure continuous improvement. Higher level documents (business and site) shall be reviewed at a frequency no longer than every two years. This frequency is based on the fact that at these levels very little change takes place within the WNR business. The review frequency of operational documents, however, will be driven by two things; if the task is new or hasn't been done by one or all of the work party previously, and secondly, if an aspect of the job has changed during or prior to the task beginning. The review of any document will be documented, either through the quality control system for higher levels documents, or through written annotation for operational documents. Control measures in particular should be regularly reviewed to ensure that they remain effective and that they are the best controls available.

9.0 Definitions

AFARP – As Far As Reasonably Practicable

PCBU – Person Conducting a Business or Undertaking – see Tasmania Work Health and Safety Act

10.0 Accountabilities

General

Officers of WNR shall ensure that AFARP, hazards are identified and where they cannot be eliminated, will be controlled. This shall include documenting hazards, processes to identify hazards relevant to WNR business and tasks it undertakes and lastly communicating hazards to the workers of WNR.

All workers of WNR shall ensure that:

- they understand the requirements of this procedure
- ensure their activities are in compliance with this procedure
- can access this procedure
- support the implementation of this Procedure by providing feedback to peers and supervisors where improvements to task compliance or risk management can be made.

The HSE Manager for WNR is to ensure AFARP that this meets National and State legislative requirements and Standards and that this document is maintained as a part of the businesses HSE management system.

11.0 References

At the time of writing the following references were used for contribution to this procedure.

- Work Health and Safety Act 2022
- Work Health and Safety Regulations 2023
- ISO 45001 2018: Occupational health and safety management systems — Requirements with guidance for use
- WNH Q24 Inductions, Training & Site Access Procedure