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PRINCIPLE HAZARD MANAGEMENT PLAN

Introduction

Principal hazards are defined as having the potential to cause multiple fatalities if the energy associated with the hazard is not controlled. The purpose of the Dump It Principal Hazard Management Plan (PHMP) is to describe how principle hazards are identified, analysed, assessed and controlled. It also describes the way in which ongoing effectiveness of critical controls associated with these hazards are deemed effective and verified.

Objective

This PHMP adheres to relevant legislation outlined in the Work Health and Safety Act 2011 (NSW) and the Work Health and Safety Regulation 2011 (NSW), as well as the following:

- ISO 31000:2009 Risk Management
- ISO 45001 Occupational Health and Safety Management
- Dump It Risk Management Manual (WHSE RA MP 3)
- Dump It Workplace, Health, & Safety Management Manual (WHS MP 1)

Scope

The PHMP covers risks that have the potential to result in a multiple fatality outcome.

This PHMP does not cover vehicles and mobile equipment, refer to the 'Vehicle and Mobile Equipment Principle Hazard Management Plan' (WHSE PHMP Veh 2).

Principal Hazards / Material Risk Identification

Dump It identifies its principal hazards in accordance with:

- Dump It Environment Risk Assessment Control Register (WHSE ENV RA FM 1);
- Dump It Operational Risk Register (WHSE - RA FM 4);
- Dump It Vehicle Risk Assessment (DI - Veh RA FM 6);
- Dump It Risk Management Manual (WHSE RA MP 3), &
- Dump It Workplace, Health, & Safety Management Manual (WHS MP 1)
- Vehicle & Mobile Equipment Principle Hazard Management Plan (WHSE PHMP VME 2)

Principle Hazard Risks are those risks with a:

- Maximum foreseeable Loss (MFL) of Loss of >70% of margin, or non-financial impacts equal to Level 5 on the severity table, or
- Residual Risk Rating (RRR) of between 19 to 25 (High)

By definition within the Dump It Risk Matrix are WHS Principle Hazard Fatal Risks.

Material Risks are those risks with a:

- Maximum Foreseeable Loss (MFL) of 31-70% of margin, or non-financial impacts equal to, or greater than, Level 4 on the Severity Table, or
- Residual Risk Rating (RRR) of between 10 to 18 (Med) on the risk matrix.

By definition within the Dump It Risk Matrix are WHS Material Risks.

Methodology

The Principal Hazards (Material Risks) that exist at Dump It were identified through a number of different sources and methodologies, including:

- Current knowledge of actual, residual and potential risk exposure at Dump It Sites.
- Risk Assessments undertaken during the Standard Operating Procedure development process.
- The Broad-Brush Risk Assessment Process (BBRA)
- Current Risk Management Plans and Risk Assessments.
- Information from the Environmental Protection Agency, (including industry alerts).
- Information from external consultants.
- Semi-Quantitative Risk Assessments (SQRA).
- Collective knowledge and experience from the workforce
- Information from other Dump It sites

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Critical Controls and Performance Standards

As a failure of a Critical Control could lead to a Principle Hazard or a Material Risk Event or Impact occurring, critical controls and performance standards need to be developed for each Principle Hazard or/ and Material Risk in accordance with Dump It Risk Management Manual (WHSE RA MP 3).

Critical Controls are those controls that have a primary role in the management of Principle / Material Risks and may be identified for all Dump It WHS Material Risk Events. A Control that significantly reduces the likelihood of a Principle / Material Risk occurring, or significantly reduces the severity of the consequences of that Principle / Material Risk is deemed to be critical.

When WHSE Principle / Material Risks are identified a prescribed process must be followed. This includes defining Performance Standards for each of the Critical Controls related to a WHSE Principle / Material Risk. The intention of this Performance Standard is to provide a benchmark or target for the standard of the Critical Control and allow an opportunity for self-assessment against this standard. This intends to enhance the quality of the controls that are identified as being Critical to managing WHSE Principle / Material Risks.

Verification of the effectiveness of the WHSE & QA management system will be determined through a documented assessment process considering the critical control design adequacy, implementation and operation, which is undertaken monthly, with annual ISO certification audits annually.

Emergency Response Plans

The Principal Hazard & Material Risks Risk Assessments identify events that have the potential to result in single or multiple fatalities in the event that controls fail or are less than adequate. These events are listed in the associated Risk Assessments and Dump Its' Risk Registers listed above.

The process to manage unwanted events, are documented in the Dump Its' Emergency Response Management Manual (WHSE ER MP 1), Risk Management Manual (WHSE RA MP 3), and Pollution Incident Response Management Plan (PIRMP) (WHSE Env MP 3).

Roles and Responsibilities

Directors

The responsibilities of the Directors must be to:

- Ensure compliance with the requirements of all legislation;
- Set standards and expectations for the management of the business and all risk management and principal hazards;
- Ensure an effective and efficient PHMP is in place, and is aligned and works collaboratively with all Dump It management manuals / plans.
- Ensure sufficient and appropriate resources are available to administer and operate the PHMP;
- Ensure there are regular audits and reviews of the PHMP and the application and efficiency of the specific hazard management controls;
- Ensure reports regarding the compliance status of the critical controls submitted by the WHSE & QA Manager are reviewed and approved;
- Ensure that actions and metrics identified for reporting as the performance standards are evaluated and reviewed for effectiveness.

Department Managers and Supervisors

The responsibilities of the Department Managers and Supervisors must be to:

- Ensure standards and expectations for the management of the Principal Hazards are met;
- Actively participate in the development, implementation, and monitoring of the PHMP;
- Provide sufficient and appropriate resources to administer and operate the PHMP;
- Develop and implement regular audits and reviews of the PHMP and the application and efficiency of the specified hazard management controls;
- Authorise and ensure implementation of corrective actions identified during the audit and review processes;
- Ensure all employees and contractors under their control are aware of any Principal Hazards in their work area and activities they have been instructed to perform;
- Ensure all employees and contractors under their control are made aware of the established controls for the Principal Hazards;
- Ensure that prior to work commencing in an area or on an activity where a Principal Hazard exists, and where no established control is available, adequate and suitable controls are developed and put in place.

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Workers

The responsibilities of all Workers must be to:

- Meet the standards and expectations set for the management of the Principal Hazards and Material Risks;
- Apply, and adhere to, the controls, practices and procedures that are implemented to manage the Principal Hazards and Material Risks;
- Comply with all Dump It workplace policies and procedures;
- Participate in the risk assessment hazard identification process as required;
- Participate in the auditing and review of the PHMP as required.

Others – Visitors and Contractors

The responsibilities of all others on site must be to:

- Comply with all Dump It policies and procedures and with all NSW state legislation
- Provide evidence of competencies as required by legislation to ensure they have the necessary skills and knowledge to carry out principal hazards and Material Risks tasks / contracts safely and efficiently.
- Complete the Dump It visitor induction

Inspection and Monitoring

Risk Registers must be monitored, reviewed and updated:

- By the relevant Department Manager, supervisors and including members with appropriate knowledge / technical expertise related to the risk issue and appropriate decision-making authority.
- Following significant events, learnings or change.

The outcomes from the inspection and monitoring process are including in the review of Material Risks and Principal Hazards provided to the Directors monthly, these are listed in the monthly management review meeting minutes.

Communication

This PHMP is be made available to all Workers, with communication of the PHMP by way of:

- Toolbox Talks
- Inductions
- Refresher Training Sessions
- Dump It's Server
- One to one workplace discussions.

Training

Before facilitating a Workplace Risk Assessment, persons must hold the certificate IV in Workplace Health and Safety competency or an equivalent or higher-level risk competency.

All other formal risk assessment methodologies are to be facilitated by risk facilitators possessing skills specific to the particular risk assessment process.

Truck drivers must hold the appropriate licence for the vehicle in use, and operators of heavy equipment are to complete the verification of competency (VOC) (RIIMPO320F – Conduct Civil Construction Excavator Operations, is used as the basis for this VOC).

Event Reporting, Investigation, and Corrective Action

Any non-compliance, events, or areas identified for improvement to the current controls must be reported in one of the following ways:

- Verbally to the relevant Supervisor / Manager;
- Identification of a workplace hazard is raised using a Hazard Near Hit Report Form (WHSE Rah 6);
- When a workplace incident occurs, it is reported using an Incident Report Form (WHSE Inc 2);
- For maintenance issues raised on their own or as part of the above the Maintenance Request Form is utilised (DI Mtn FM 3);
- By raising a notification if the problem is associated with equipment or the environment using the appropriate form as outlined above.

Non-compliances with the PHMP must be investigated as necessary to minimise the likelihood of recurrence, and the results must be communicated to all affected persons.

Preventative measures to deter the effectiveness of control measures are formally assessed through the review and audit processes. All Workers are expected to informally review the controls on an ongoing basis and report any improvement opportunities to their Supervisor.

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Following the occurrence of a significant and/or high potential event, the qualitative PHMP and the Site Dump It Operational Risk Register or/and the Dump It Vehicle Risk Assessment, must be reviewed and updated. The appropriate Dump It Site Operational Management Plan / Manual must also be reviewed and updated following a significant and/or high potential event.

Any additional Principal Hazards (Material Risks) identified through risk management practices on site, must be captured within the PHMP and be subject to the qualitative risk assessment process, including the updating of the Dump It Operational Risk Register. The Principal Hazards (Material Risks) associated with each operational process, and subsequent risk control measures, must be clearly detailed and available to all Workers.

Records and Document Control

Completed Principal Hazards / Material Risk assessments must be recorded in the Dump It Risk Registers. The Dump risk registers for Principal Hazards / Material Risk are maintained in the Dump It Management System on Google Drive.

The Safety Manager or the site manager, or their delegate, is responsible for ensuring the risks identified in the risk assessment;

- Are included into the Dump It Operational Risk Register, Environment or Vehicle Risk Assessment;
- That the Risk Registers are maintained and current, and
- That Material Risks are identified and those that are Principal Hazards included in this PHMP.

Review and Audit Process

The Internal Audit Procedure (WHSE Aud P 1) mandates that a formal annual review of the risk profile be incorporated into the regular monthly compliance audit agenda, and that new or changes to existing risk issues be captured on the Risk register.

This review is to include:

- Formal trending of lead and lag KPI's;
- Identification of any new Principal Hazards / Material Risks or major changes that could impact the Risk profile;
- Critical control adequacy assessments, including control hierarchy consideration;
- Completion and implementation status of risk reduction actions;
- All Significant Events that have been identified at site, across Dump It Sites, related to the site Material Risk profile;
- New developments in technology that have the potential to reduce Principle / Material Risks.
- All Principal Hazards.

Related Documents

Title	Document No.
Vehicle Principle Hazard Management Plan	WHSE PHMP Veh 2
WHS Management Manual	WHS MP 1
Risk Management Manual	WHSE RA MP 3
Safe Work Method Statement Training	HR T 7
Safe Work Method Statement Template	WHS SWMS 2
Operational Risk Assessment Register	WHSE RA FM 4
Vehicle Risk Assessment	DI - Veh RA FM 6
Incident & Investigation Management Plan	WHSE - Inc MP 1
Emergency Response Management Plan	WHSE - ER MP 1
DI Risk Management Framework	WHSE RMF 1

For the Acts and Regulations governing Dump Its' day to day operations refer to Legislative and Compliance Management Manual (QA - MP Leg 2).

Dump It Recognised Principle Hazards

The following table lists the Principle Hazards identified through the Dump It Operational Risk Assessment.

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Principle Hazard	Site - Location	Inherent RR	Residual RR
Vehicle Maintenance – working under vehicles	16 Robert St, Maintenance workshop	25 High	11 Med
Conveyor System – maintenance when working at heights	12 Penelope Cres, Recycling shed	25 High	5 Low
Driving trucks – vehicle accident	13 Long St, and 12 Penelope Cres	25 High	11 Med
Driving trucks – Skip bin unloading - interaction with worker	13 Long St, and 12 Penelope Cres	25 High	11 Med
Operating heavy equipment – worker interaction	13 Long St, and 12 Penelope Cres	25 High	11 Med

Safe Work Method Statements (SWMS) have been developed and signed off on by all workers undertaking the different tasks. Dump It has combined the JSEA and SWI into one easy to follow SWMS.

Definitions

Audit

A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the management systems audit criteria set by the organisation are fulfilled.

As Low As Reasonably Practical (ALARP)

A process that applies a graded approach to reducing risk. The goal of this process is not merely to reduce risk, but to reduce risks to levels that are as low as reasonably achievable.

Cease Unsafe Work

A worker may cease, or refuse to carry out, work if the worker has a reasonable concern that to carry out the work would expose the worker to a serious risk to the worker's health or safety, emanating from an immediate or imminent exposure to a hazard

Consequence

Consequence is the outcome of an event or situation expressed qualitatively or quantitatively, being a loss, injury, disadvantage or gain

Control

The means used to manage risk. In particular, a policy, standard, procedure, device, system, communication, or other action that acts to limit uncertainty in the achievement of business objectives and/or to ensure compliance with the law. Controls are the result of control actions.

Critical Controls

Controls that if they were otherwise not in place the risk event would be inevitable ('show stoppers'). A control or set of controls that have a primary role in the management of material risks.

Facilitated Risk Assessment

A level 1 risk assessment is one undertaken on the day / on the spot by a worker as part of their own safety.

A level 2 risk assessment within Dump It is entered into a risk register, and is completed by 2 or more workers, this is a facilitated risk assessment.

Internal and external audits / inspections are not included as a facilitated risk assessment.

Hazard

A source of potential harm, injury or detriment.



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Principal Hazard

A principal hazard within the Dump It working environment, has the potential to cause a fatality or multiple fatalities, see 'Very High-Risk Issues'

This term is not used within the legislation that governs Dump It as a company, this is used primarily for the explanation of what a 'Principal Hazard' is.

Under the NSW Work Health and Safety (Mines and Petroleum Sites) Regulation 2014. Principal hazards have been identified in legislation for special consideration because they are hazards that have the potential to cause an incident with very serious consequences, even when the likelihood of that incident occurring may be low.

As well as hazards that may result in large-scale disasters, other hazards that have a reasonable potential to result in multiple deaths in a series of recurring incidents, are also principal hazards.

Risk

The chance of something happening that will have an impact on objectives.

Note: A risk is often specified in terms of an event or circumstance and the consequences that may flow from it. Risk is measured in terms of a combination of the consequences of an event and their likelihood. Risk may have a positive or negative impact.

Risk Assessment

The overall process of risk identification, risk analysis and risk evaluation.

Risk Evaluation

Process of comparing the results of risk analysis with risk criteria to deter whether the risk and /or its magnitude are acceptable or tolerable.

Risk Event

The description of the occurrence or change of a particular set of circumstances. One or more risk events may describe a risk issue.

Risk Identification

Process of finding, recognising and describing risks.

Risk Management

Systematic application of management processes and practice to the risk activities including identifying, analysing, evaluation, treating, monitoring and reviewing risk. Risk management also including the activities of communicating, consulting and establishing the context of the risk.

Risk Profile

Description of any set of risks.

Risk Register

Record of risks including risk evaluation and control processes.

Risk Treatment

Risk treatment involves selecting options for modifying the risks and implementing appropriate risk improvement actions. Risk treatment will take into consideration the costs and benefits of the additional controls or improvement actions.

Should

The word 'should' is to be understood as non-mandatory, advising or recommended.

Very High-Risk Issues

All risks that are identified within the red boxes, and require the initiator and the authoriser to determine if the event is or maybe catastrophic, and has immediate implications across Dump It.

Risk Matrix

RISK ASSESSMENT						
Select the identified likelihood & Consequence to have a risk score						
RISK SCORE		CONSEQUENCE				
		Insignificant	Minor	Moderate	Major	Severe
LIKELIHOOD	Almost Certainly	8 LOW	13 MED	18 MED	23 HIGH	25 HIGH
	Likely	7 LOW	12 MED	17 MED	21 HIGH	24 HIGH
	Possible	4 LOW	9 MED	16 MED	19 HIGH	22 HIGH
	Unlikely	2 LOW	5 LOW	10 MED	15 MED	20 HIGH
	Rare	1 LOW	3 LOW	6 LOW	11 MED	14 MED

Likelihood Matrix – Consider the likelihood

- What is the likelihood of the consequences identified happening?
- Look at the descriptions and choose the most suitable.
- Select the 'Number level' which is your 'Likelihood Level'.

Level	Descriptor	Description	Indicative Frequency (expected to occur)
5	Almost Certainly	The event will occur on a weekly basis	Once a week or more
4	Likely	The event will occur on a monthly basis	Once a month
3	Possible	The event might occur once every 6 months	Once every six months
2	Unlikely	The event does occur sometimes	Once a year
1	Rare	Heard of something like this occurring	Happened in the industry but not in our organisation

Risk Score – Risk Management Context Parameters

- When considering and selecting control measures, you must do so within the Risk Management parameters outlined in the table below.

Number Score	Risk Level	Parameters
19 – 25	HIGH	This activity MUST NOT proceed. Alternative work methods must be identified.
9 – 18	MED	The activity can proceed so long as the highest level and most appropriate risk control measures have been identified and implemented.
1 - 8	LOW	The activity may proceed with normal supervision after implementing the control measures

In determining the Risk Rating use the risk matrix based on the intersection of consequence and likelihood. One of the following Risk Ratings will be determined:

	Low Risk	Medium Risk	High Risk	Very High Risk
Action required	Hold	Information Notice	Hazard Notice	Alert Notice
Timeframe for action	Review monthly	Act within 28 days later	Act within 21 days soon	Act within 14 days now



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Very High-Risk issues (all risks that are identified within the red boxes) require the initiator and the authoriser to determine if the event is or maybe catastrophic, and has immediate implications across Dump It. An Alert Notice is to be developed and distributed in accordance with the Responsibility Matrix.

Low Risk issues are to be revisited by the relevant each month. For issues in the “hold” category, two outcomes have been identified. These include:

- Continue to monitor: Issues which may result in an escalation in risk score following regular monthly review, and maybe subject to further activity.
- Not a Dump It-wide risk: Issues which have been considered, and deemed to warrant no further action

Consequence Matrix – Consider the Consequence

- Consider what is known and what could reasonably be expected to happen
- Look at the descriptions and choose the most suitable.
- Select the 'Number level' which is your 'Consequence Level'.

Level	Descriptor	Description	Quality	Safety	Environment	Legal	Financial	People	Time
5	Severe	Most objectives cannot be achieved	Totally unsuitable	Fatality	Multiple community complaints. Media coverage in main pages. Environmental pollution in environment beyond boundaries.	Court case for breach	Loss of >70% of margin	Unlawful industrial action by employees > 31% staff turnover > 50% Lost Productivity > 50% Absenteeism	Unable to meet Client requirements
4	Major	Some important objectives cannot be achieved	Major work needed for correction of quality issue	Lost time injury – illness Hospitalisation	Several community complaints. Local media interest, pollution extending beyond site but can be controlled, notification to strator authorities is required, potential for receiving an infringement notice	Temporary operating restrictions imposed pending investigation	Loss of 31-70% of margin	Protected industrial action by employees 20-49% Loss Productivity 20-30% Staff turnover 20-40% Absenteeism	Long delay in filling Client order
3	Moderate	Some objectives affected	Substantial work needed for correction of quality issue	Medical treatment required	Occasional community complaints. Significant environmental pollution confined to site requiring extensive clean up.	Breach infringement notice issued and fine imposed	Loss of 11-30% of margin	Non-industrial action related to safety 10-19% Staff turnover 10-19% Lost Productivity 10-19% Absenteeism	Short delay in filling Client order
2	Minor	Minor effects can be easily managed	Minor adjustments need for correction of quality issue	Assisted first aid treatment	Isolated community complaints, incident confined to site requiring immediate action with minimal environmental impact	Writing warning and minor fine imposed	Loss of 1-10% of margin	5-9% Staff turnover 5-9% Lost Productivity 5-9% Absenteeism	Delay with potential to impact on filling Client order
1	Insignificant	Negligible impact on objectives	Minimal adjustment needed for correction of quality issue	Self-administered first aid treatment	Minor incident contained within the work area with systems already in place to cope with any environmental impact	Verbal warning received from regulator	Loss of <1% of margin	=/<4% Staff turnover =<4% Lost productivity =<4% Absenteeism	Non-critical delay

Amendment Register

To ensure good records are maintained for all amendments to our Principle Hazard Management Plan.

Date	Section	Page	Amendment Details / Reason	Document Owner	Version