

OHS IMPROVEMENT NOTICE

To: INPEX Operations Australia Pty Ltd

In conducting an OHS inspection at the CPF Ichthys Explorer facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again clauses 9(2)(d) and 9(2)(f) of Schedule 3 to the Act at the CPF Ichthys Explorer.

The reasons for my opinion are:

I inspected the job site pertinent to an incident that occurred on 14 July 2017 involving two electricians who inadvertently cut a de-energised 690V power cable supplying temporary sea water lift pump "B". Based on the evidence seen and provided by the operator, it was concluded that there were multiple failures of work place risk control and the facility's Integrated Safe System of Work / Permit to Work system.

The observed failures included:

- No clear work instruction or procedures for the task being undertaken;
- Task level job hazard risk assessment not undertaken;
- Inadequate implementation of controls against identified hazards;
- Inadequate supervision of the work team; and
- Inadequate critical review of submitted permit paperwork by the "Permit Approver" and "Permit Issuer" prior to issue.

Additionally, the facility Permit to Work review process failed to recognise that the work location under the false floor of the switch room is a restricted work space with limited access, or that the electricians would be working next to live cables. No emergency response and rescue plan taking account of these factors was implemented prior to commencement of the work.

INPEX has not taken all reasonably practicable steps "to implement and maintain systems of work at the facility that are safe and without risk to health" and "to provide all members of the workforce, with information, instruction, training and supervision necessary for them to carry out their activities in a manner that does not adversely affect the health and safety of persons at the facility". INPEX has contravened clause 9(2)(d) and 9(2)(f) of Schedule 3 to the Act.

As a result of the significant gaps in the implementation of the Permit to Work system, work place risk controls, training and competency, and inadequate supervision to ensure safe execution of work, I am satisfied that these contraventions constitute a risk to the health and safety of persons at the CPF Ichthys Explorer facility.

You are required to take action within **60** days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Complete a management review of the Integrated Safe System of Work / Permit to Work system and procedures at the CPF Ichthys Explorer facility, and implement any actions identified from this review to ensure that the systems of work at the facility are safe and without risk to health.

The terms of reference of the review should include the following items:

1. The competence of all personnel involved in permit processing, including the Permit Approver and Permit Issuer;
2. The use of task level Job Hazard Analysis to ensure identification and application of effective risk control;
3. Adequacy of information such as work instructions and procedures for all work activities;
4. Adequacy of supervision to ensure Permit to Work compliance and monitoring of work activities;
5. Planning related to confined / restricted space entries and emergency response; and
6. Review the auditing of Permit to Work for effectiveness in minimising risk.

Or, implement such other controls to comply with OPGGSA Clause (9)(2)(d) and 9(2)(f) and reduce the risk to a level that is as low as reasonably practicable.

Signed:



NOPSEMA inspector

Dated: 17 August 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name: [REDACTED]
Position: NOPSEMA Inspector
Address: Send in electronic format via email to:
submissions@nopsema.gov.au
Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **673** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.