PRO-4.5-0001-1-01
Permit to Work

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1. Purpose

Whenever BP conducts construction, maintenance, demolition, remediation and other similar work that are typical of our industry, there is the potential for harm to people and the environment and for damage to equipment. Therefore, an effective permit to work process provides a system of work that allows tasks to be completed safely and without unplanned loss of containment with the potential to cause environmental damage or to damage a plant or equipment.

A Permit to Work system is a key element of the BP Group Defined Practice for Control of Work and the BP Golden Rules of Safety. It is a formal documented system used to control certain types of non-routine work which are defined as being hazardous. This procedure sets out a required approach to safely control this work and to comply with the requirements of GDP 4.5-0001 Control of Work and OMS Group Essential 4.5.1.

2. Scope

The requirement specified in this procedure applies equally to BP employees, contractors and visitors engaged in BP ANZ Fuels Value Chain; Marketing, Supply & Logistics.

Specific sites, areas and activities may have more detailed OMS requirements and where these exist the requirements will be specified in local procedures, safe work instructions, manuals, handbooks or specific standards.

This procedure does not apply to BP owned Terminals.

3. Definitions

Accredited Contractors

Are those approved by the BP Accredited Contractor System

ANZ

Australia and New Zealand

Certificates

Certificates are documents that define the core preparations required for work to proceed and do not, by themselves, authorise work to proceed. Certificates can be used to manage focused tasks efficiently which are not sufficiently managed by a typical permit or work clearance (e.g. precautions for ground disturbance).

Cold work

Work that does not introduce a source of ignition.

Competent Person

An individual in a Control of Work role who can demonstrate that they have professional or technical training, knowledge, actual experience, qualifications and ability to enable them to:

a. Perform duties at the level of responsibility allocated to them;

b. Understand any potential hazards related to work (or equipment) under consideration;

c. Recognise any technical defects or omissions in a task (or equipment) and the adverse implications for health and safety caused by the hazard(s) and / or omission(s); and

d. Be able to specify corrective action(s) to mitigate the hazards.

Confined Space

The Safe Work Australia Code of Practice for Confined Spaces, February 2014 provides the most complete definition of a confined space as:

“A confined space is determined by the hazards associated with a set of specific circumstances and not just because work is performed in a small
A confined space means an enclosed or partially enclosed space that:

a. Is not designed or intended primarily to be occupied by a person; and,

b. Is, or is designed or intended to be, at normal atmospheric pressure while any person is in the space; and,

c. Is or is likely to be a risk to health and safety from:

i. An atmosphere that does not have a safe oxygen level, or

ii. Contaminants, including airborne gases, vapours and dusts, that may cause injury from fire or explosion, or

iii. Harmful concentrations of any airborne contaminants, or engulfment.

Confined spaces are commonly found in vats, tanks, pits, pipes, ducts, flues, chimneys, silos, containers, pressure vessels, underground sewers, wet or dry wells, shafts, trenches, tunnels or other similar enclosed or partially enclosed structures, when these examples meet the definition of a confined space in the WHS Regulations."

The definition within some jurisdictions in Australia and New Zealand may align with AS/NZS2865 in which the wording differs but the interpretation is consistent with the above.


CoW
Control of Work

CSE
Confined Space Entry

Energy systems
Systems which, by their nature, contain energy (e.g., hydraulic, mechanical, electrical, potential, pneumatic).

Excluded Area
Excluded areas are those areas in which no foreseeable fire hazards exist from petroleum products or vapours. These areas are exempt from the requirements of Hot Work Permits, Cold Work Permits, and Work Clearances. They remain subject to other control of work requirements including to risk assess and obtain site authorisation to proceed. This may include the shop in a service station, new facilities during construction (greenfield sites), the facility office in a depot, or a work area within a BP Facility approved by the ANZ S&OR Engineering Authority.

Green Zone
A designated zone on Air BP ANZ Facilities authorised by the AirBP ANZ Regional Engineering Lead where no foreseeable fire hazards exist from petroleum products or vapours. It shall not include hazardous areas and should be easily delineated on site by geographical features. It shall be clearly identified on a site specific map, displayed at the site (e.g. in the site office).

As per ‘Excluded Areas’, Green Zones are exempt from the requirements of Hot Work Permits, Cold Work Permits, and Work Clearances. They remain subject to other control of work requirements including the requirement to risk assess and obtain site authorisation to proceed.

Ground disturbance
Work that involves a man-made cut, cavity, trench or depression in the earth’s surface formed by earth removal. This includes cutting into hard surfaces such as concrete, driving piles into or by breaking the earth’s
surface, and/or ground removal.

**Handover**
The detailed review (and communication process) of a CoW responsibility or authority, work area or site condition and on-going work that is supported with a documented process.

**Hazard**
Anything that has the potential to result in undesired events such as injury, illness or damage.

**Hazardous Area**
Area in which an explosive atmosphere is present or may be expected to be present in quantities such as to require special precautions for construction, installation and use of equipment. Hazardous Areas are classified in accordance with AS/NZS 60079.10.1.

For Air BP, Hazardous Areas in this procedure are defined as the Red Zone. If no Green / Red Zones have been approved for the site then the Hazardous Area is defined as the entire Restricted Area.

**High Risk Construction Work**
The Model WHS Regulations (enacted in most Australian states), defines high risk construction work as construction work that:

a. Involves a risk of a person falling more than 2 metres; or
b. Is carried out on a telecommunication tower; or
c. Involves demolition of an element of a structure that is load-bearing or otherwise related to the physical integrity of the structure; or
d. Involves, or is likely to involve, the disturbance of asbestos; or
e. Involves structural alterations or repairs that require temporary support to prevent collapse; or
f. Is carried out in or near a confined space; or
g. Is carried out in or near:
   i. A shaft or trench with an excavated depth greater than 1.5 metres; or
   ii. A tunnel; or
h. Involves the use of explosives; or
i. Is carried out on or near pressurised gas distribution mains or piping; or,
j. Is carried out on or near chemical, fuel or refrigerant lines; or
k. Is carried out on or near energised electrical installations or services; or,
l. Is carried out in an area that may have a contaminated or flammable atmosphere; or
m. Involves tilt-up or precast concrete; or
n. Is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians; or
o. Is carried out in an area at a workplace in which there is any movement of powered mobile plant; or
p. Is carried out in an area in which there are artificial extremes of temperature; or
q. Is carried out in or near water or other liquid that involves a risk of drowning; or
r. Involves diving work.

Hot Work  Work that involves either the use or the creation of a flame, spark or energy discharge that could act as the ignition source for a fire or explosion.

Typical examples of hot work include:
   a. Welding, grinding and oxy cutting;
   b. Use of battery operated equipment and power tools;
   c. Abrasive blasting (i.e. sandblasting);
   d. Power cutting / drilling;
   e. Crane operations;
   f. Use of excavators;
   g. Use of generators and welding machines;
   h. Use of mobile plant such as elevated work platforms.

Isolation  The process of isolating any energy system as per requirements of PRO4.5-0001-1-02 Energy Isolation.

Issuing Authority  The person who is trained and assessed as competent and formally authorised to Issue Permits.

JSA  Job Safety Analysis. A risk assessment of the works to be undertaken. The BP JSA is the formal risk assessment of lower risk activities and includes assessment of the works, the job site, the process, the environment and any SIMOPS hazards.

Monitoring  The routine function of regular inspection that is performed by a responsible and competent person.

MS&L  Marketing, Supply and Logistics.

NZ  New Zealand.

PCBU  Person Conducting a Business or Undertaking. As per the Safe Work Australia Model Work Health and Safety law enacted in most jurisdictions in Australia and New Zealand.

Performing Authority  May be in charge of the people performing the work or may be the person performing the work. Sometimes referred to as the permit recipient.

Permit  A formal and detailed agreed document that contains location, time, equipment to be worked on, scope of work and tools and equipment to be used, hazard identification, mitigation / precaution measure(s) used and the names of those authorising the work and performing the work.

Principal Contractor  Principal Contractors and their obligations are defined in Work Health and Safety Regulations in most jurisdictions including those who have enacted the Model WHS Regulations. Where defined, refer to those regulations. If BP engages a 3rd party as the Principal Contractor for a construction project and authorises the 3rd party to have management or control of the workplace then the 3rd party is to discharge the duties of a Principal Contractor. Construction projects can only have one Principal Contractor at any specific time.

Red Zone  A designated zone on Air BP ANZ Facilities, authorised by the AirBP ANZ.
(Air BP) regional Engineering Lead where foreseeable fire hazards exist from petroleum products or vapours. It shall as a minimum include hazardous areas and should be easily delineated on site by geographical features. It shall be clearly identified on a site specific map, displayed at the site (e.g. in the site office).

As a minimum, a WPCG Work Clearance is required for all hot work within Red Zones and outside hazardous areas. Hot Work Permits are mandatory for all hot work within hazardous areas.

Restricted Area
Is that area in which BP exercise control over movements and operations such as the area within the boundary fence of Depots or service stations, owned or leased by BP.

Risk
A measure of loss / harm to people, the environment, compliance status, group reputation, assets or business performance in terms of the product of the probability of an event occurring and the magnitude of its impact.

Risk Assessment
The process of hazard identification and the evaluation of the potential for identified hazards to be realised in any given endeavour.

Routine
A procedure that does not vary in its execution and reoccurs within a prescribed and repeated cycle.

Simultaneous Operations (SIMOPS)
Separate tasks or works that take place at the same time with the potential to impact each other.

Safe Work Method Statements (SWMS)
The SWMS identifies the tasks to be undertaken in the work, the associated hazards and identifies suitable control measures and the responsible person(s) for their implementation. The SWMS is the formal risk assessment of the works to be permitted. Some organisations or regions (e.g. New Zealand) may instead refer to this as a JSA.

Task
An action or series of actions in support of a piece of work.

TRA
Task Risk Assessment. The formal risk assessment of higher risk activities and includes assessment of the works, the job site, the process, the environment and any SIMOPS hazards.

TRAT
Task Risk Assessment Table. Details minimum risk assessment requirements for certain tasks.

WHS
Work Health and Safety

Work
An endeavour made up of a number of different tasks.

Work Place Clearance Group (WPCG)
The Work Place Clearance Group (WPCG) is an unincorporated joint venture of which BP Australia is a partner.

4. Roles & Responsibilities

4.1. ANZ MS&L S&OR Engineering Authority

The ANZ MS&L S&OR Engineering Authority is responsible for:

- Approving additional excluded areas within a BP Facility via a formal documented management of change process.
Note: The ANZ MS&L S&OR Engineering Authority does not have accountability for Air BP operations.

4.2. **Air BP Operations Manager ANZ**

The Air BP Operations Manager ANZ has the following responsibility with respect to this permit to work procedure:

a. Approving additional excluded areas within an Air BP Facility via a formal documented management of change process.

b. Authorisation (and suspension) of work permit issuing authorities for Air BP facilities in accordance with this procedure.

4.3. **National Health & Safety Manager - Asset Management**

The National H&S Manager - Asset Management is responsible for:

a. Implementation of GDP 4.5-0001 across the BP ANZ MS&L business by acting as the Subject Matter Expert;

b. Providing technical expertise to Issuing Authorities in regards to the successful application of Task Risk Assessments (TRA);

c. Intervening and escalating as appropriate when standards and / or procedural breaches are discovered.

d. Conducting review and routine analysis of permit to work verification program results in accordance with PRO-4.5-0001-0-01 Control of Work to achieve compliance and drive continuous improvement.

e. Authorisation of work permit Issuing Authorities for Australian MS&L facilities in accordance with this procedure.

4.4. **BP Australia Control of Work Assurance Advisor**

The CoW Assurance Advisor is responsible for:

a. Supporting the National H&S Manager - Asset Management as required;

b. Supporting nominated trainee Issuing Authorities in the training process through the following means:

   1. Co-ordination of the Issuing Authority training program; and
   2. Review of permits for quality and conformance to this procedure.

c. Recommending to the National H&S Manager - Asset Management personnel as competent upon demonstration of quality and conformance to this procedure; and

d. Coaching, mentoring, guiding and verify that Issuing Authorities are fully conversant and familiar with the requirements specified in this procedure.

4.5. **BP NZ Control of Work Assurance Officer**

The New Zealand Control of Work Assurance Officer is responsible for:

a. Authorisation of work permit Issuing Authorities for BP NZ MS&L facilities in accordance with this procedure.

b. Intervene and escalate as appropriate when standards and / or procedural breaches are discovered in BP NZ MS&L facilities.

4.6. **Issuing Authority**

The Issuing Authority is responsible for:

a. Ensuring that they have the correct level of authority for authorising the work controlled by the permit (and their authority is current).

b. Reviewing contractor risk assessment/s (e.g. JSA, SWMS, etc.) for the permitted work.
c. Liaising with site operations to control Simultaneous Operations (SIMOPS), including impact of the work on the site operations or the impact of site operations on the work.
d. Ensure that all Work Permits that are issued are prepared and executed in full compliance with this procedure;
e. Detail the work to be undertaken and the tools or equipment to be used - in writing as well as verbally;
f. Detail actions taken or to be taken to make safe and indicate hazards of the work;
g. Specify monitoring requirements including frequency of inspections and permit control measures (such as gas testing, verifying integrity of isolations, etc.);
h. Ensure that all workforce members read and understand the Work Permit and acknowledge by signing the Work Permit or Permit to Work Acknowledgement Form;
i. Maintain regular communication with the employees performing the work, or delegate this to a permit re-endorser;
j. Confirm that the work is monitored if the permit re-endorsing is delegated; and
k. Ensure that the area and relevant equipment is made safe before handover to the Performing Authority or delegate this to a permit re-endorser.
l. For confined space entry, determining that the emergency response and rescue plan proposed by the Performing Authority is adequate for the safe and timely extraction of personnel for credible scenarios identified.

The Issuing Authority shall complete all documentation relevant to the Work Permit Set. The exception to this is the following documents which may also be completed by the Performing Authority;
m. LOTO plan; and
n. Confined Space Entry Record.

The Issuing Authority shall not be the same person as the Performing Authority.

4.7. Permit Re-endorser

The re-endorser of a Permit is responsible for the following on the day they re-endorse a permit:

a. Liaising with site operations to control Simultaneous Operations (SIMOPS), including impact of the work on the site operations or the impact of site operations on the work.
b. Confirming only the work described on the permit is to be performed;
c. The site conditions have not changed;
d. The controls detailed on the permit have not been compromised;
e. Monitoring the work in accordance with the monitoring requirements detailed on the permit;
f. Ensuring that all workforce members read and understand the Work Permit and acknowledge by signing the Work Permit or Permit to Work Acknowledgement Form; and
g. Ensuring that the area and relevant equipment is made safe before handover to the Performing Authority.

The Permit Re-endorser shall not be the same person as the Performing Authority.

4.8. Performing Authority

The Performing Authority (PA) shall be competent in understanding the job being performed and its intrinsic hazards and how to best control these. The Performing Authority is responsible for the provision of a JSA / SWMS, and is legally required to do so for all High Risk work in jurisdictions in Australia operating under the model WHS regulations. The Performing Authority shall NOT be the same person as the Issuing Authority for a Permit;

The Performing Authority is responsible for the following:
a. Ensure that the tools and equipment to be used are fit for purpose and inspected and listed on the permit
b. Be aware of hazards that could exist and have the necessary precautions put in place;
c. Receive the Work Permit document from the Issuing Authority and indicate to the Issuing Authority if any of the requirements are ambiguous or unclear;
d. Sign the Work Permit before work commences thereby accepting any conditions or controls stipulated in the Work Permit and documents referenced on the work permit;
e. Conducting a Pre-start meeting with the work crew;
f. Ensure that all workforce members read and understand the risk assessment and Work Permit and acknowledge this by signing the Work Permit or Permit to Work Acknowledgement Form;
g. Ensure that skilled, qualified, trained and competent personnel perform the work, adhering to the conditions of the Work Permit;
h. Ensure that the job is performed in a safe manner within the conditions prescribed for the work on the permit or work clearance and be responsible for the work and for the people who work on the job; and
i. Make equipment and area safe prior to handover or return to service.

4.9. Site Representative

The Site Representative shall be the Site Manager or delegate, or if the site is unmanned it may be the Issuing Authority.

The Site Representative is responsible for the overall safety of the site. The Site Representative shall be aware of all other work or planned site operations that may interact with the work (i.e. SIMOPs). Therefore no work shall be undertaken before the Site Representative countersigns the permit.

The Site Representative may stop or defer work at any time.

4.10. Task Risk Assessment Facilitator

The facilitator of a BP Task Risk Assessment (TRA), required as per the TRA Table (TRAT), is responsible for ensuring that:

a. The worksite is inspected as a part of conducting the task risk assessment prior to work being performed.
b. At least one member or representative of the team or teams performing the task participates in the task risk assessment.
c. The TRA team defines and records risk control and mitigation actions as part of the task risk assessment process.
d. The TRA considers the hierarchy of controls in the following order:
   1. Elimination;
   2. Substitution;
   3. Engineering Controls;
   4. Isolation;
   5. Administrative Controls; and
   6. Personal Protection Equipment (PPE).
e. TRA findings are:
   1. Communicated in writing by recording on the approved BP TRA document; and
   2. Signed off by the TRA team members
5. Methodology

5.1. Training

Training is provided to ensure that the roles and responsibilities within the Permit to Work process are fully understood and a standard of competency is maintained.

Work Place Clearance Group (WPCG) training is managed external to BP by the joint venture which provides governance, with assurance by the BP representative on the joint venture.

When a BP NZ Work Clearance Checklist is utilised in accordance with this procedure, personnel completing the form shall be trained and competent in the use of any such form.

5.1.1. Nomination to Attend Permit to Work Training

All persons seeking certification as an authorised Issuing Authority shall submit to the National H&S Manager - Asset Management a nomination from their line manager or BP sponsor. The decision to allow the applicant to attend the course is at the discretion of the National H&S Manager - Asset Management in consultation with the applicant's Line Manager or BP sponsor. This is delegated in New Zealand to the New Zealand Control of Work Assurance Officer.

5.1.2. Issuing Authority Training – Theory, Practical and Buddy Program

All required online training modules should be completed by all trainees prior to attending the Issuing Authority face to face training course. All online training shall be completed prior to commencing buddy permits in the field.

The initial permit to work training for Issuing Authorities shall be conducted by an approved trainer and consists of classroom, practical field exercises, and training in risk assessment. A competence assessment shall be completed of both the classroom content and the practical field exercises.

On completion of the initial training, prior to accreditation as an Issuing Authority, the trainee shall undergo ‘on the job’ training. This consists of issuing permits under the guidance and coaching of an authorised Issuing Authority – referred as ‘buddy’ permits. The ‘buddy’ Issuing Authority is to countersign all documents as it is they who have the approved Issuing Authority.

Upon satisfaction of the business of the level of competence of the trainee in the field issuing permits under the buddy system, a review shall be completed of a minimum of two Work Permits by a member of the Control of Work team. This is delegated in New Zealand to the New Zealand Control of Work Assurance Officer. Further work permits may be requested by the control of work team. Upon competence being demonstrated, the trainee shall be provided with a certificate confirming their authorisation as an Issuing Authority has been re-endorsed for a further three years.

5.1.3. Refresher Training

The Issuing Authority shall complete refresher training and have their Work Permits assessed with verbal and written feedback provided every three years for re-authorisation. Individuals who have maintained the required levels of competency are provided with recertification of their authorisation as an Issuing Authority has been re-endorsed for a further three years.

5.1.4. Confined Space Entry Issuing Authority Training

To become an accredited Confined Space Entry Issuing Authority the person shall:

a. Be an authorised work permit Issuing Authority;

b. In Australia, have successfully completed Confined Space Entry training from a Registered Training Organisation which includes as a minimum the following modules;

1. MSMWHS217 - Gas test atmospheres ; and

2. MSMPER205 - Enter confined space or RIIWHS202D - Enter and work in confined spaces;
5.1.5. Expiry or Suspension of the Issuing Authority Accreditation

If a Permit to Work Issuing Authority does not issue a Work Permit set for an extended period or the currency of their competence to do so is of concern to the business or the National H&S Manager - Asset Management, then their accreditation may be suspended. Confirmation of this shall be provided by the National H&S Manager - Asset Management.

At the discretion of the National H&S Manager - Asset Management, expired or suspended Issuing Authorities may be subject to attend an Issuing Authority training session.

In Air BP, this is the responsibility of the Air BP Operations Manager ANZ.

5.1.6. Permit Re-endorser

To be listed on a work permit as a re-endorser the person shall be a current authorised Issuing Authority in accordance with this procedure or a person that the Issuing Authority deems to be a competent and responsible person to re-endorse the permit. As a minimum, a permit re-endorser shall have the following competencies:

a. Understand the responsibilities of the Issuing Authority, Performing Authority, Site Representative, and Re-endorser;

b. Be competent in the identification of site hazards, process hazards, and SIMOPs that may impact on the task;

c. Understand the requirements for documenting the re-endorsement on the work permit set; and

d. For Confined Space Entry Permits, shall have completed the training prescribed in 5.1.4 b

Note: If the Re-endorser is issuing a Gas Test Certificate associated with the permit, refer requirements of 5.8.1.

5.1.7. Work Clearance Training and Accreditation

The Australian WPCG Work Clearance Training programme has been designed to ensure maintenance and minor works at WPCG member approved facilities are carried out in a safe and controlled manner. Approved BP facilities are: Retail service stations, Depots, BP commercial customer facilities, and Air BP facilities.
The accreditation process involves training and assessment conducted by the WPCG training provider or WPCG accredited ‘train the trainers’, and regular refresher training completed in accordance with WPCG requirements.

The BP NZ Work Clearance Checklist authorised for use under this procedure shall also require training and refresher training to be conducted on a three yearly basis as a minimum.

5.2. Planning and Scheduling

The person responsible for planning the work shall allow time for the following actions for the safe execution of the work:

- Define the scope of work;
- Identification of personnel and equipment required;
- Identification of dependent and linked work;
- Identification of SIMOPS and their compatibility with the work;
- Review associated procedures / Risk Assessments / JSA / SWMS;
- Define any Regulatory requirements;
- Inspection of the work site;
- Conduct a risk assessment of the task;
- Implementation of control measures including isolations;
- Arrange resources for the work; and
- Coordinate and prioritise work to reduce conflict between tasks.

Subject Matter Experts (SMEs) may be included in the planning stages, as required by the technical complexity of the task(s).

5.3. Performing Authority’s Safe Work Method Statement (SWMS) or Job Safety Analysis (JSA)

All tasks shall be risk assessed. For all work, the Performing Authority should document what the intended outcome of the work is and the means by which it will be safely achieved. This is commonly known as the SWMS, or in some companies and regions it may be referred to as a JSA.

There are particular legislated requirements in most states and territories in ANZ which have enacted the Model WHS legislation. Under the Model WHS Regulations (where enacted), a safe work method...
statement (SWMS) shall be prepared for all high risk construction work and electrical work on energised electrical equipment. Under these regulations, the documents shall:

a. List the types of high risk construction work being done
b. State the health and safety hazards and risks arising from the work to be carried out
c. Describe how the risks will be controlled
d. Describe how the risk control measures will be implemented, monitored and reviewed
e. Take into consideration factors that may affect the way in which the high risk work is carried out; and,
f. Be readily accessible and easy to read.

For work being conducted under a permit the Performing Authority should provide a SWMS/JSA to the Issuing Authority before issuing a work permit and prior to conducting a BP TRA (if required for the task as per the BP TRAT).

The JSA/SWMS should cover task, process, and site hazards; and address SIMOPs and Human Factors. If there are gaps, such as specific site hazards are not considered, this shall be updated at the work site prior to work or a BP risk assessment is conducted, facilitated by the Issuing Authority for the permit. This may be a BP TRA conducted in accordance with 5.4.

5.4. BP Task Risk Assessment (TRA)

Before issue of a Work Permit, a risk assessment of the task shall be completed. BP TRA Table (TRAT) provides minimum requirements for BP Risk Assessments. This risk assessment shall, as a minimum, include the Issuing Authority and Performing Authority.

A HITRA Competent Person or an Issuing Authority shall facilitate a BP TRA conducted for work within the scope of the Control of Work process. All BP TRA’s shall use the risk matrix in figure 1.

The consequence impact table from GG3.1 Hazard Identification and Task Risk Assessment shall be used to determine the worst credible consequence impact in order to rate the risk in the ANZ TRA Risk Matrix using the probability of the event occurring at this impact level with the controls in place.

The BP TRA shall be signed off by the Issuing Authority, the Performing Authority and any other risk assessment team members. It shall have the signature of the facilitator (if different to the Issuing Authority) and be signed as approved by the person authorised to do so in accordance with the level of risk (as per TRA Approval Table for the business, Appendix 1).

All personnel shall sign the Permit to Work Acknowledgement form or other pre-start document which references the risk assessment to demonstrate this has been read and understood by all parties. If the task is conducted by one person, then the signing of the permit by the Performing Authority meets this requirement as the permit shall specify that all work shall be completed in accordance with the risk assessment.

The risk assessment shall be attached to the Work Permit and displayed at the work site during work.
Figure 2 – ANZ TRA Risk Matrix

5.5. Work Permits and Work Clearances

5.5.1. When Work Permits and Clearances are not required

Hot Work Permits, Cold Work Permits and Work Clearances are not required for routine tasks, or for work in any excluded areas. Note that the requirements for a risk assessment remains for all work. For routine operations this typically informs the generation of a work instruction for the task.

Work required to be completed for BP outside restricted areas on equipment which has been in service with hydrocarbon products shall be subject to an appropriate safe system of work. It is the responsibility of the person engaging the third party to conduct the work for BP to assure that this system is appropriate to manage the risk. Equipment sent to third parties, which has been in service with hydrocarbon products, should be issued with documentation of the equipment status.

5.5.2. Principal Contractors

If the Principal Contractor for Construction Work is not BP, then construction work may be completed by the Principal Contractor without being subject to BP Permit to Work Processes if fuel is not stored on site in equipment for site operation. This includes:

a. BP Confined Space Entry Permits;

b. BP Hot Work Permits;
b. BP Cold Work Permits;
c. WPCG Work Clearance Form
d. BP NZ Work Clearance Checklist;
e. BP TRA (including BP TRAT);
f. BP Ground Disturbance Certificates and Checklists;
g. BP Gas Test Certificates
h. Forms associated with the issue of the above (e.g. BP LOTO Form, Permit to Work Acknowledgement)

These construction projects follow BP project management processes to provide assurance to BP that the work will be safely executed. Construction Projects controlled by a Principal Contractor may be subject to specific regulatory requirements including Work Health and Safety Management Plans; general construction induction training for all workers; and that a person who commissions a construction project and engages a principal contractor for the project gives the principal contractor any information the person has in relation to hazards and risks at or in the vicinity of the workplace where the construction work is to be carried out.

A principal contractor with management or control of a workplace shall:
   i. manage risks associated with the construction work
   j. secure the workplace so unauthorised persons cannot enter
   k. comply with all safe work method statement requirements for high risk construction work.
   l. comply with all other regulatory requirements.

Note: if the Principal Contractor is BP, this section 5.5.2 does not apply. However, the area may be an excluded area (see definitions) for some or all of the project, and subject to exclusion from Hot Work Permit, Cold Work Permit and Work Clearance requirements in accordance with to 5.5.1.

5.5.3. Cold Work Permits

A Cold Work Permit is required for all non-routine work where:
   a. The work does not introduce or create a source of ignition; and either
      i. The work is being performed without the use of a WPCG Work Clearance Form or BP NZ Work Clearance Checklist issued in accordance with 5.5.6; or
      ii. The work is performed with the use of a WPCG Work Clearance Form and the work requires a WPCG Minimum Control Checklist (e.g. Minor Work at Height or Minor Ground Disturbance). However, the work cannot or will not be in compliance with WPCG Minimum Control Checklist.

A Cold Work Permit is not a permission to conduct hot work or to enter a confined space.

A Cold Work Permit is valid for the period noted on the Permit document.

5.5.4. Hot Work Permits

A Hot Work Permit is required for:
   a. All non-routine hot work inside hazardous areas that cannot or will not be performed in compliance with the requirements of the WPCG Minimum Control Checklist for Minor Hot Work;
   b. All non-routine hot work in the restricted area on equipment that has been in hydrocarbon service and appropriate precautions have not been undertaken to eliminate all contact with potentially flammable vapour (e.g. depressurisation, drained, isolated, purged);
   c. Hot Work outside the hazardous area performed without the use of a WPCG Work Clearance Form or BP NZ Work Clearance Checklist issued in accordance with 5.5.6;

All Hot Work Permits for Hot Work in hazardous areas shall be accompanied by a valid Gas Test Certificate as per section 5.8. Continuous gas testing is required for all hot work activity that creates an
uncontrolled ignition source inside hazardous areas. This type of work includes burning, welding, grinding, air arcing, soldering, open flame, stress relieving, preheating or any similar type of activity.

5.5.5. Work Clearance

The WPCG Work Clearance Form may be used in Australia by WPCG accredited contractors, and the BP NZ Work Clearance Checklist may be used in New Zealand by trained and competent persons in that process, to authorise the following tasks:

a. Cold Work not involving Ground Disturbance or Work at Height;
b. Hot Work outside the hazardous area;
c. Minor Hot Work within the hazardous area that will be performed in compliance with the requirements of the WPCG Minimum Control Checklist for minor Hot Work.
d. Minor Ground Disturbance that will be performed in compliance with the requirements of the WPCG Minimum Control Checklist for minor Ground Disturbance.
e. Minor Work at Heights that will be performed in compliance with the requirements of the WPCG Minimum Control Checklist for minor Work at Height.

A Work Clearance shall not be used for:

f. Entry to, or work in, a confined space. This shall be subject to a Confined Space Entry Permit.
g. Asbestos removal, including by a licensed asbestos removalist. This shall be subject to a hot or cold work permit, as applicable to the work method and location

5.5.6. WPCG Minimum Controls Checklists

Some work may be performed with authorisation by the WPCG Work Clearance Form if supported by the use of WPCG Minimum Controls Checklist/s. This work includes:

a. Minor Work at Height
b. Minor Ground Disturbance
c. Minor Hot Work in hazardous areas.

If work involves more than one of the above then both checklists are required. For example the use of an EWP at a height <11m within a hazardous area requires both the WPCG Minor Work at Height Minimum Control Checklist and the WPCG Minor Hot Work Minimum Control Checklist.

These three checklists provide requirements for performing such work. If the requirements cannot or will not be met for the task then a BP Cold or Hot Work Permit (as applicable) is required for the work.

The following are out of scope and cannot be authorised by the WPCG Minimum Controls Checklists. A BP Hot or Cold Work Permit (as applicable) is needed for all work that involves:

d. Hot work that involves the use of matches or lighters, or creation of open flames and uncontrolled sparks in hazardous areas. This type of work includes use of blow torches, soldering, oxy acetylene, naked flames, welding or any similar activity that creates an uncontrolled ignition source.
e. Use of petrol or LPG powered/driven equipment including mobile plant, generators, chainsaws, etc. in hazardous areas
f. Confined space entry, or use of any type of powered equipment in confined spaces.
g. Abrasive blasting.
h. High pressure water blasting on live equipment containing fuel / LPG or on structural steel.
i. Inter-tank transfers of fuel and bulk product transfers to or from road vehicles that are not covered by procedures including transfer of contaminated or cross over (shandy) products; or
j. Disturbance or removal of asbestos containing material.
k. Live electrical works.
l. Excavations (other than drilling or coring) to a depth ≥1.2m
m. Working at heights ≥2m within 2m of an exposed edge.
n. Working from a workbox (man basket) attached to a crane or forklift.
o. Erection, modification and dismantling of scaffolding >4m.
p. Use of an EWP ≥11m
5.5.7. Issue of Work Permits

All Work Permits shall be clear and legible and all sections shall be completed.

All Work Permits and associated documentation for the work shall:

a. Specify the Performing Authority
b. Define the scope of work, including the equipment to be worked on, location and duration.
c. Identify the tools and equipment to be used
d. Identify potential hazards (through associated hazard identification and risk assessment).
e. Reference task risk assessments.
f. Identify isolation of energy sources required to conduct the work.
g. Define control measures to eliminate or mitigate risks.
h. Link the work to other associated work permits or simultaneous operations.
i. Record isolations that are common to more than one permit.
j. Determine controls that prevent isolations that are common to more than one permit from being removed before all permits have been signed off.
k. Specifies who will be performing the work.
l. Records that the risks and control measures associated with the task(s) have been communicated to the employees performing the work.
m. Be authorised by the Issuing Authority.
n. Specify the frequency of monitoring required.
o. Designate re-endorsement by a responsible person on the permit.
p. Records the completion of the work.

The work permit only authorises work that is defined in the task description.

Where the Issuing Authority or Site Representative is not satisfied that conditions of the permit can be met, they shall not issue the permit.

The Performing Authority shall be responsible for supervision of the works during completion and should not leave site during the work. Any requirement from the risk assessment for additional monitoring by the Issuing Authority (or delegated re-endorser) or Site Representative then this shall be documented on the permit.

A worksite inspection shall be performed, which:

q. Confirms that the control(s) and mitigation(s) measures recorded in the permit documentation or the procedure that needs to be in place before start of work are in place.
r. Confirms that conditions have not materially changed so as to necessitate different or additional control measures.

The Issuing Authority shall sign the permit to indicate that the Performing Authority is authorised to perform the work specified and it is safe for the Performing Authority, their work crew, and for the site for this to proceed. The Performing Authority shall read the Work Permit, and sign the permit to indicate that the contents are understood, they are responsible for performing the tasks as documented and the job will be carried out in accordance with the permit.

If additional persons are not present when the permit is issued by the Issuing Authority it is the responsibility of the Performing Authority to ensure that prior to working under the permit that any additional personnel understand the permit conditions, associated documents including risk assessments, and sign the Permit to Work Acknowledgement Form.

If the person performing the role of the Performing Authority is to change, handover shall be documented including authorisation from the Issuing Authority. This shall be attached to the permit.

If a single person is engaged to complete the work, the Permit to Work Acknowledgement Form is not required as the signing of the receipt of the permit serves this purpose.
If deemed sufficient by the Issuing Authority, one permit may cover any number of workers irrespective of trade employed on the job specified.

5.5.8. Site Meeting prior to Start of Work

Prior to commencement of the site works, a meeting shall be conducted on site between the Site Representative / Issuing Authority and the Performing Authority and other involved persons to discuss and agree upon Health, Safety and Environmental matters that are foreseeable for the duration of the works confirming that all matters are adequately covered in the risk assessment for the task or the work permit.

If the Performing Authority is responsible for additional personnel carrying out the work, the Performing Authority shall conduct a pre-start / toolbox meeting with all those involved in the work and outline the tasks covered by the permit, the hazards involved, the control measures and mitigations including emergency procedures. All personnel shall sign the Permit to Work Acknowledgement form or other pre-start document which references the Permit or Work Clearance to demonstrate this has been read and understood by all parties.

Where Work Clearances are used, these will be considered to be an adequate record for all parties to sign.

5.6. Energy Isolation

All isolations of all energy systems required to conduct the task safely are conducted and recorded in accordance with PRO-4.5-0001-1-02 Energy Isolation.

If the work is not complete the equipment shall remain locked out / tagged out until the equipment has been tested and is safe to return to service.

5.7. Confined Space Entry Permits

A Confined Space Entry Permit is required for entry to any confined space. The requirements of PRO-4.5-0001-1-04 Confined Space Entry shall be complied with for all confined space entry.

The Confined Space Entry Permit is to cover the safety of the confined space environment only. If work is to be conducted within the confined space the Confined Space Entry Permit shall be accompanied by a Cold Work or Hot Work Permit.

All Confined Space Entry Permits shall be accompanied by a valid Gas Test Certificate and LOTO Plan.

Before a Confined Space Entry Permit is issued, the Issuing Authority shall ensure that a risk assessment has been conducted in accordance with the requirements of the BP TRAT, and a reliable Emergency Response Plan is in place and included in the permit set.

Atmospheric testing requirements for Confined Space Entry shall be in accordance with Table 1, and limits as per Table 2.

A Confined Space Entry permit is valid for a maximum of one shift of the Performing Authority. After this period the permit must be revalidated by re-endorsement as specified on the permit. The person conducting the permit re-endorsement shall have completed the appropriate training as described in Section 5.1.5.b of this procedure.

Confined space entry into a bulk tank or vessel shall have an isolation drawing prepared showing all connections and isolation techniques applied.

5.8. Gas Test Certificates

A Gas Test Certificate shall be completed for all:

a. Hot Work Permits; and
b. Confined Space Entry Permits.

A Gas Test Certificate or other monitoring for airborne contaminants may also be required for other works if deemed to be required by the associated risk assessment for the task. Table 1 documents what the minimum parameters are that shall be tested when issuing a Gas Test Certificate.
### Table 1 - Atmospheric Testing Requirements

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Minimum Parameters Tested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hot Work Permit</td>
<td>LEL and O₂</td>
</tr>
<tr>
<td>Confined Space Permit</td>
<td>LEL, CO, H₂S and O₂</td>
</tr>
</tbody>
</table>

### 5.8.1 Issue of Gas Test Certificates

A BP Issuing Authority authorised to issue Gas Test Certificates shall issue the initial Gas Test Certificate associated with a BP Work Permit.

To conduct gas testing associated with a Gas Test Certificate the person shall be an authorised Issuing Authority or shall have completed the following and be competent in its use:

a. **In Australia**, MSMWHS217 - *Gas test atmospheres* MSAPMOHS217A - *Gas test atmospheres*;
   (note this is typically included within Confined Space Entry training provided by Registered Training Organisations and as such is typically completed as part of completing such training provided that this course code is included within the certified training).
   
   Note: *MSMWHS217* above has superseded and is equivalent to *MSAPMOHS217A*, which is also accepted due to the equivalency.

b. **In New Zealand**, *Unit Standard 25510 – Gas Testing*

The gas detector shall be:

- Within the calibration date;
- “Bump tested” or “challenged” prior to each use;

A Gas Test Certificate shall only be issued once equipment and the work area has been gas tested in accordance with Table 1 and found to not have elevated LEL readings, have oxygen within the safe range and if applicable not contain toxic levels of contaminants as specified in Table 2.

### 5.8.2 Validity of Gas Test Certificates

A Gas Test Certificate is valid for one shift or a maximum of 12 hours. The work area or equipment shall be re-tested at least once per shift and the certificate re-endorsed accordingly. If a more frequent re-testing schedule has been determined by risk assessment for the task, the Issuing Authority shall note this on the Permits and Gas Test Certificate.

If conditions change, work is stopped or the area vacated beyond normal shut down periods, or if emergencies arise which affect the permit conditions, Gas Test Certificate (and any associated Work Permits) become invalid until the work area or equipment is retested and the Gas Test Certificate is re-endorsed. If an emergency has occurred, emergency response and incident notification processes for the site shall also be followed prior to recommencing work.

Permits requiring a Gas Test Certificate are not valid and cannot be re-endorsed until a re-test has been performed and the Gas Test Certificate has been re-endorsed.

In the case of an expired Gas Test Certificate, the Performing Authority shall stop work and alert the Issuing Authority.
## Atmosphere Gas Limits

<table>
<thead>
<tr>
<th>Oxygen %</th>
<th>Flammable Gas % LEL</th>
<th>Toxic Contaminants (ppm)</th>
<th>Conditions of Entry</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>H₂S</td>
<td>CO</td>
</tr>
<tr>
<td>Above</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>23.5</td>
<td>Above</td>
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<tr>
<td></td>
<td>Below</td>
<td></td>
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<tr>
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<td>5</td>
<td>100</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>30</td>
<td></td>
</tr>
</tbody>
</table>

### Table 2: Confined Space and Hot Work Atmospheric Gas Limits

Note that if the confined space entry is to be conducted for work undertaken over longer than 8 hours shifts, all limits for toxic contaminants shall be halved in Table 2.
5.9. **Ground Disturbance Certificates**

In addition to the applicable Work Permit or Work Clearance, a Ground Disturbance Certificate is required for:

a. All excavations and trenching (other than coring or boring) to a depth of 1.2m or more.

b. All ground disturbances that cannot or will not be conducted in compliance with the requirements of the WPCG Minor Ground Disturbance Minimum Control Checklist.

A Ground Disturbance Certificate shall be issued by a person authorised by the National H&S Manager - Asset Management to issue Ground Disturbance Certificates and shall be accompanied by a Work Permit for the work.

5.10. **Displaying the Permit or Work Clearance**

The Performing Authority shall ensure that the original copy of all Permits or Work Clearances, including the Permit to Work Acknowledgement sign on sheet and associated documents (e.g. risk assessments, Performing Authority JSA/ SWMS and Gas Test Certificate as applicable) are readily available during the course of the work. These shall be displayed at the work site for duration of work, or at the entrance to a confined space for the duration of entry.

A duplicate copy of the Permits or Work Clearances should be issued to the Site Representative and should be displayed appropriately during the work.

5.11. **Monitoring**

All ongoing work requiring a permit shall be regularly monitored and managed by a responsible person. Permits should note the frequency of monitoring as determined in the risk assessment. The frequency of monitoring should consider:

a. Complexity of the task;

b. Competency of the persons undertaking the task; and

c. The level of residual risk as defined by the risk assessment for the task.

The Issuing Authority may delegate the monitoring of the work place to a competent person.

The Issuing Authority for the permit shall (directly or by delegation to the permit re-endorser):

d. Maintain regular communication with the employees performing the work.

e. Confirm that the work is monitored in accordance with the monitoring requirements.

The person assigned to monitor the work place shall have the competency to recognise when site conditions no longer comply with the Work Permit. They shall stop the work and request a reassessment if any of the following occur:

f. Unsafe practices are observed;

g. Unsafe conditions are observed; or

h. Conditions have arisen that necessitate revision to the permit.

5.12. **Work Interruptions**

The worksite should be inspected and confirmed as being in a safe condition when work is interrupted. Interruptions may include breaks (e.g., work, meal, smoke) and shift changes. If it is determined from the risk assessment that specific interruptions are to be subject to re-endorsement then this shall be specified on the permit. Otherwise, it is the responsibility of the Performing Authority to ensure this inspection is completed.

If conditions or control measures are observed to have changed, work shall not restart until the situation has been assessed; and conditions and control measures have returned to those required by the permit. If the conditions and control measures of the initial work permit cannot be met, the original risk assessment shall be revisited and, if appropriate, either a new Work Permit is issued or the Work Permit is updated by the Issuing Authority and re-issued with the revised conditions.
5.13. **Re-endorsement of a Permit**

The re-endorsement of a permit is an acknowledgment that the safe work conditions originally set on the Work Permit have not changed and the work may recommence. Endorsement shall be made by the Issuing Authority or person nominated and recorded on the permit whom shall meet the competency requirements for a re-endorser detailed in this procedure.

5.14. **Work Permit Completion and Close Out**

When the work is completed, the equipment and the site are in a safe condition, then the permit shall be closed out and the original permit signed by the Performing Authority as complete.

The Site Representative or Issuing Authority (or nominated re-endorser) should inspect the work site to ensure that the work has been completed and the equipment and site left in a safe condition before signing the permit closure.

If the work described on the permit is not completed at the expiry time listed, the Performing Authority is responsible for indicating the status of the work to the Issuing Authority (or delegated Re-endorser) and Site Representative, leaving the site in a safe condition, and applying for a new permit or extension of the permit validity by the Issuing Authority.

If an extension of the expiration time and date of the permit is required, e.g. due to a delay to works, then the Issuing Authority may authorise a new expiration date and time. This shall be initialised by both the Issuing Authority and Performing Authority of the permit.

5.14.1. **Returning to Service**

Equipment that has been removed from service for maintenance shall on completion of maintenance be tested in service to confirm the integrity of the system. If this is not possible at the time the maintenance is completed, then maintenance shall be deemed incomplete and the equipment shall remain locked out / tagged out until testing in service can be undertaken.

6. **Associated Documents**

6.1. **Documents**

BP Permit to Work templates are issued for ANZ MS&L in Australia by the National H&S Manager - Asset Management and within New Zealand through the BP NZ Control of Work Assurance Officer.

6.2. **Records**

6.2.1. **Retention of Permits**

The Issuing Authority shall retain copies of permits and all other associated documents within the Work Permit set for at least 3 years and make these available for audit as required, including when being re-certified as an Issuing Authority.

A copy of the Work Permit set is to be retained on site during the work period.

7. **Verification**

The information outlined in this document shall be included in the ANZ FVC MS&L Self-Verification Programme (PRO-8.2-0001-0-01) or an equivalently approved BP assessment process.

8. **External References**

This Document was drafted with reference to relevant legislation at the date of drafting, including but not limited to, relevant Acts, Regulations, Australian Standards and industry codes and practices. Details of current legislation can be provided by the HSSE team on request.
9. Revision Summary

<table>
<thead>
<tr>
<th>Version</th>
<th>Prepared by</th>
<th>Description of Change</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Adrian Connolly</td>
<td>Update to STP01-02 Permit to Work for migration to OMS Procedure, closure of actions and implement continuous improvement opportunities.</td>
<td>14/11/2014</td>
</tr>
<tr>
<td>2</td>
<td>Adrian Connolly</td>
<td>Updates to document format and layout for readability. Minor spelling and grammar corrections. Minor changes to wording of clauses to improve clarity of requirements. Removal of references to NZOSL, Bitumen and Terminals as now out of scope. Merger of Depots, Commercial and Retail TRA Approval Table into single BP Australia table. Removal of TRAT from Appendix 1. This will be a separate document. Addition of BP 5x5 HITRA Risk Matrix required for BP TRA's. Clarified Cold Work Permit requirement.</td>
<td>24/05/2016</td>
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<tr>
<td>3</td>
<td>Adrian Connolly</td>
<td>Update for the inclusion of WPCG Minimum Control Checklist requirements</td>
<td>12/9/2017</td>
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10. Appendix 1 TRA Approval Tables

**BP Australia**

<table>
<thead>
<tr>
<th>Residual risk level</th>
<th>Minimum level of approval</th>
<th>Comments</th>
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<tbody>
<tr>
<td>VH – Very High</td>
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<td>H – High</td>
<td>General Manager – Asset Management</td>
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<tr>
<td>M – Medium</td>
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<td>L – Low</td>
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<tr>
<td></td>
<td>Performing Authority</td>
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**BP New Zealand Retail**

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<tr>
<td></td>
<td>Performing Authority</td>
<td>BP Employee or Contractor using BP NZ Work Clearance form</td>
</tr>
</tbody>
</table>

Prepared by: Adrian Connolly
Approved by: Tom Angliss & Owen Quake

Doc Number: PRO-4.5-0001-1-01  Aproved Date: 23/10/17  Next Review Due: 23/10/2020
Version Number: 3  eMoC Number: 11374  Page 26 of 27
### Residual risk level

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<td>Authorised Site Manager or AR using Approved Work Clearance form</td>
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<td>Issuing Authority</td>
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</tr>
<tr>
<td></td>
<td>Performing Authority</td>
<td>BP employee or Contractor using Approved Work Clearance form</td>
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</table>

### Remediation Management Australia & New Zealand

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<th>Residual risk level</th>
<th>Minimum level of approval</th>
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<td>VH – Very High</td>
<td>Not allowed</td>
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<tr>
<td>H – High</td>
<td>Remediation Operations Manager</td>
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<td>M – Medium</td>
<td>Issuing Authority / Area Authority</td>
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End of Document