APPENDIX L

Contractor OHSE Management Procedure







Contractor OHS&E Management Procedure

Power and Water Corporate Procedure

1	Purpose	. 1
2	Purpose	
3	References	2
4	Responsibilities and Authorities	2
5	Definitions	. 3
6	Records	4
7	Attachments	4
8	Contractor Categories	4
9	General Requirements (All Categories)	5
10	Category 1 Contractor Requirements	6
11	Category 2 Contractor Requirements	
12	Category 3 Contractor Requirements	
13	Category 4 Contractor Requirements	8
Atta	chment 1 – Flow Chart to Identify Contractor Category	9
Atta	chment 2 – Contractor Category Requirements Summary	10
Atta	chment 3 – Contractor Occupational, Health, Safety and Environment Management	
Syst	tem Questionnaire	. 11
Atta	chment 4 - Contractor Occupational, Health and Safety Risk Assessment Sheet	14
Atta	chment 5 – Contractor Environmental Risk Assessment Sheet	15
Atta	chment 6 – Contractor Induction Checklist	. 1

1 Purpose

This procedure provides guidelines to Power and Water Corporation personnel and Contractors to manage the OHS and environmental aspects of contracts, contract works, and contractor personnel, including specification, evaluation, management, monitoring, and review.

2 Scope

2.1 This procedure will apply to all Power and Water Corporation Business Units and Contractors.

Authorised by:	Prepared by:	Issue Date: 31/03/2006	Status: Final
Kim Wood	Clive Scobie	File No:	Version:
Managing Director	Manager Quality, Safety & Risk	QDOC2006/69	2

3 References

- 3.1 AS/NZS 4801 Occupational Health and Safety Management Systems Standard.
- 3.2 ISO14001 Environmental Management Systems Standard.
- 3.3 Electricity Supply Association of Australia Limited, (2002), (Draft) National Guidelines For Contract Occupational Health and Safety Management, ESAA Melbourne.
- 3.4 Australian Industrial Relations Commission, Power and Water Certified Agreement.
- 3.5 Northern Territory Government Work Health Act.
- 3.6 Northern Territory Government, Work Health (Occupational Health and Safety) Regulations.
- 3.7 Northern Territory Government, Environmental Assessment Act.
- 3.8 Northern Territory Government, Waste Management and Pollution Control Act.
- 3.9 Job Safety and Environment Analysis Work Instruction.
- 3.10 Operational Risk Assessment Procedure.
- 3.11 Power and Water Contractor Performance Reports procedure.

4 Responsibilities and Authorities

Role / Title	Responsibility
Managing Director	Approves Power and Water Procedure for Contractor OHS and Environmental Management.
	 Approves Power and Water contracts within defined authority and ensures Power and Water OHS and environmental requirements are included.
Manager Quality, Safety and Risk	 Monitors and maintains document control of Power and Water Procedure for Contractor OHS and Environmental Management
Business Unit General Manager	Approves Business Unit Procedures for Contractor OHS and Environmental Management within limits of Power and Water procedure.
	 Approves Business Unit contracts within defined authority and ensures Power and Water OHS and environmental requirements are included.
Business Unit Contract Supervisor	Business unit employee as nominated in the ATIT who is responsible for developing contract specifications and ensuring Power and Water and Business Unit OHS and environmental requirements are included.
Manager Projects and Procurement	Ensures requirements of Power and Water Procedure for Contractor OHS and Environmental Management are included in Power and Water contract documentation

Role / Title	Responsibility
Action Officer	Power and Water employee responsible to ensure all requirements of the Power and Water procedure for Contractor OHS and Environmental Management are applied as required during the contract delivery process.

5 Definitions

Word	Definition
Action Officer (s)	Person or persons nominated for each individual contract who has responsibility to ensure Contractor OHS and environmental requirements are applied at each stage of the contract delivery process. A period or panel contract may specify more than one action officer.
ATIT	Approval to invite tenders form
Certified Agreement	Refers to the Power and Water Certified Agreement.
Contract	A legal document that specifies the terms and conditions for goods or services supplied by a contractor to Power and Water Corporation.
Contractor	A party which supplies goods or services to Power and Water.
Hazard	A source of potential harm. Also known as the source of a risk.
Job Safety and Environment Analysis (JSEA)	Documented statement that describes the work to be carried out, identifies the work activities assessed as having safety and environmental risks, and describes the control measures that will be applied to the work activities.
OHS	Refers to Occupational Health and Safety.
Occupational Health, Safety and Environment (OHS&E) Management System	That part of the overall management system which includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining OHS and environment policy, objectives and targets. Performance measurement includes measurement of OHS and environmental management activities and results.
Period or Panel Contract.	A Power and Water contract arrangement which allows several contractors, (or a panel of contactors), who have already completed a tender process to be considered for supply of goods and services
Risk	The chance of something happening that will have an impact on objectives.
	Note, risk could also be attached to strategic issues of finance and reputation.

Shall Mandatory requirement.

Should Advisory or discretionary requirement.

Site specific OHS&E management plan (OHS&E Plan)

A plan that identifies and documents site-specific OHS and environmental risks and control measures associated with

the work to be undertaken.

Subcontractor The party that provides a service and/or product to a

contractor or subcontractor.

Tender Price, bid, tender, quotation or proposal.

6 Records

6.1 All records resulting from this procedure shall be filed/stored in accordance with Power and Water registry procedures.

7 Attachments

- 7.1 Attachment 1: Flow Chart To Identify Contractor Category
- 7.2 Attachment 2: Contactor Category Requirements Summary
- 7.3 Attachment 3: Contractor OHS&E Management System Questionnaire
- 7.4 Attachment 4: Contract OHS Risk Assessment Sheet
- 7.5 Attachment 5: Contract Environmental Risk Assessment Sheet
- 7.6 Attachment 6: Contractor Induction Checklist

8 Contractor Categories

For OHS and environmental purposes Power and Water Contractors are classified into four Categories.

- 8.1 Category 1 Contractor:- Individual working alongside Power and Water employees under Power and Water supervision. Category 1 Contractors are to be treated in all aspects of OHS and environmental responsibility as if they were Power and Water employees. An example would be a contract accountant or contract fitter.
- 8.2 Category 2 Contractor:- Organisations or individuals engaged under Contract to carry out specific tasks or provide specified services within existing Business Unit operations. Category 2 Contractors shall be classified according to high, medium, or low risk work. The Business Unit Contract Supervisor will determine the OHS risk and environmental risk, using Attachment 4 and 5 respectively.
 - a) Category 2 High Risk Contract: This refers to a large, complex and high risk Contract in which Contractors shall demonstrate a high level of OHS and environmental management. Examples of high risk contracts are hazardous materials removal and major building maintenance or renovation.
 - b) Category 2 Medium Risk Contract: This refers to a medium, less complex Contract with medium risk in which Contractors shall undertake a contract specific risk assessment and complete site specific OHS&E plans. Examples of

- medium risk Contracts are vegetation management and installation of specialised equipment.
- c) Category 2 Low Risk Contract: This refers to a smaller low risk Contract in which Contractors are expected to meet minimum Power and Water obligations and undertake Contract specific job safety and environmental analysis to ensure risks are identified and controlled for the Contract services. Examples of low risk Contracts are a courier service or cleaning and garden maintenance.
- 8.3 Category 3 Contractor:- Organisations or individuals engaged for a discrete project. An example of a Category 3 Contractor is a project such as building a new power station.
- 8.4 Category 4 Contractor:- Organisations or individuals, (usually remote community councils) engaged in the Remote Operations Business Unit to provide service delivery to remote communities. The General Manager of Remote Operations Business Unit will determine classification of a Remote Operations contract.

9 General Requirements (All Categories)

- 9.1 The following applies to all Contracts. Attachment 2 is a checklist for all OHS and environmental requirements.
- 9.2 For all contracts there must be a designated *Action Officer (s)* who are responsible to ensure the OHS and environmental Contractor requirements are effectively applied for each Contract.
- 9.3 The action officer shall complete the induction checklist (Attachment 6) for each Contractor before they commence work for the first time, and at any time thereafter that there is a change to the Contractor's responsible manager, or a substantial change in the type or location of work, such as a new contract portion, or new work direction under a period contract.
- 9.4 Before commencement of work all Contractor personnel shall receive appropriate orientation and induction training. Power and Water Permit to Work systems and emergency procedures must be explained. It must be confirmed that all tools and equipment to be used are in a safe condition and working.
- 9.5 All Contractor personnel working on Power and Water work sites shall be suitably identified. The Action Officer shall be advised in advance who will be working on the job including induction status and qualifications.
- 9.6 All contractors shall meet all the OHS requirements specified in Section 35 of the Power and Water Certified Agreement. Contractors, their employees, and subcontractors must comply with standard provisions of Section 35.11 of the Certified Agreement:
 - Occupational Health and Safety and Workers Compensation legislation,
 - Safe working practices;
 - Licensing and registration requirements;
 - Codes of Practice and Standards established or promulgated by the appropriate industry regulator or standard setting entity including those prescribed under the Workplace Relations Act 1996;
 - Reporting monthly on a range of OHS indicators;

- Reporting monthly on workers compensation indicators; and,
- Reporting on appropriate junctures on quality assurance.
- 9.7 All contracts shall be monitored by the nominated Action Officer and subject to periodic reviews of performance in accordance with Power and Water's Contract Performance Reports procedure.

10 Category 1 Contractor Requirements

10.1 Category 1 Contractor personnel are to be treated in all aspects of OHS and environmental responsibility as if they were Power and Water employees. Category 1 Contractors shall comply with rules applicable to all Contractors as shown in Section 9.

11 Category 2 Contractor Requirements

- 11.1 Calculate the level of OHS (using Attachment 4) and environmental (using Attachment 5) risk separately. The worst case shall be used to classify the overall risk of the Contract. For example a Contract may have a high OHS risk but a medium environmental risk, therefore the overall risk is high.
- 11.2 All Category 2 Contactors shall comply with requirements of Section 9. Additional OHS and environmental requirements are:
 - a) Category 2 High Risk Contracts: High-risk Contractors shall consider OHS and environmental requirements at the process stages described in Section 12.3 (Rules for Category 3 Contractors).
 - b) Category 2 Medium Risk Contracts: Medium risk contracts shall undertake a contract specific risk assessment, develop site specific OHS&E management plans which control the identified risks, and conduct task specific job safety and environmental analysis.
 - c) Category 2 Low Risk Contracts: Low risk Contracts must have a good understanding of hazards and risks associated with their activities and demonstrate this through task specific job safety and environmental analysis.

12 Category 3 Contractor Requirements

- 12.1 Category 3 Contractors are engaged in projects that will be carried out in a designated area separate from Power and Water controlled operations. Contractors within this Category are responsible to carry out their contracted work safely and in compliance with regulatory requirements and Power and Water safety and environmental standards. The Contractors OHS and environmental responsibilities are to be included as part of the Contract and a review process must be in place to ensure duties are carried out in accordance with the Contract and regulatory requirements.
- 12.2 The contractor shall have an appropriate OHS&E Management System and supervision to ensure safety and environmental requirements of the contract are maintained.

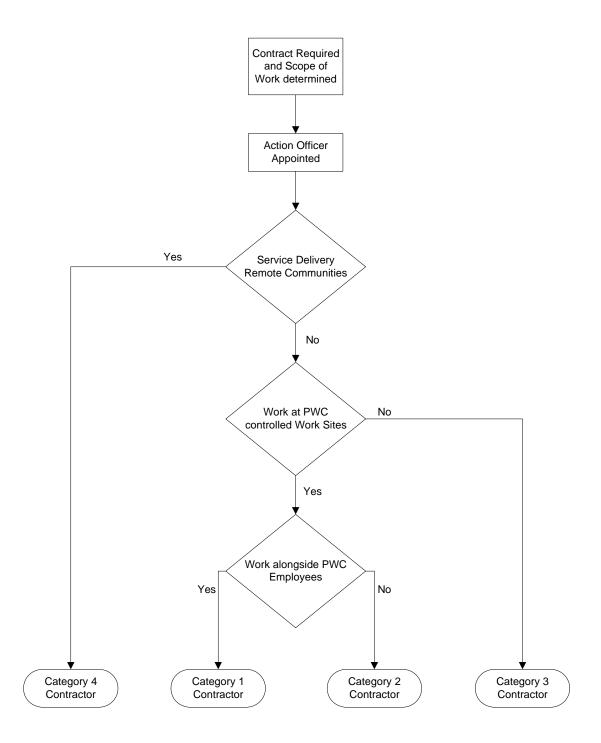
- 12.3 In addition to the rules in Section 9, OHS and environmental requirements shall be considered at each of the following process stages: (Note, Requirements in this section also apply to Category 2 High Risk Contractors as per 11.2(a).)
 - Tender Schedules: The Contract tender schedules are to include potential OHS and environmental hazards the job or Contract may involve. OHS and environmental hazards should be determined in consultation with the Quality, Safety and Risk group and Environmental Services.
 - Pre-tender Meeting/Discussions: Power and Water shall discuss potential OHS and environmental hazards at any pre-tender or industry briefing meetings with Contractors.
 - Tendering: Tenderers shall complete and return the OHS&E Hazard Control Plan Schedule by providing an outline of their proposed Hazard Control Plan in response to the nominated activities.
 - Selection: The tender assessment must include consideration of the Contractor's past OHS and environmental performance, the OHS&E Management System, and the OHS&E Hazard Control Plan. OHS and environmental considerations shall receive appropriate consideration relative to other tender assessment criteria.
 - Contractor's OHS&E Management System: Tender documents shall specify the requirement for completion of Attachment 3 by the Contractor to determine the extent of the Contractor's OHS&E Management System.
 - Site specific OHS&E Plan: Tender documents shall specify the requirement for an OHS&E plan that identifies and addresses safety and environmental hazards associated with the Contract works.
 - Past OHS and Environmental Performance: Tender documents shall specify the requirement for the Contractor to document evidence of corporate OHS and environmental performance as well as examples of OHS and environmental performance from recent projects.
 - Contract Terms:, The Contract terms will ensure that the Contractor will comply
 with Power and Water's Integrated Management System policy, rules,
 procedures and standards, all applicable laws, demonstration of adequate levels
 of workers compensation and general liability insurance, indemnification
 agreement and termination clause or penalties for lack of OHS and
 environmental performance.
 - Contractor Information Session: Power and Water shall conduct a Contractor information session with the successful tenderer to review safety and environmental expectations and other requirements based on the OHS plan and EMP, including reporting of incidents and workers compensation information. This session may be coincident with activities required under Section 9.3, including completion of the initial Induction Checklist.
 - Monitoring and Evaluation: Power and Water shall monitor the Contractors' work and carry out formal reviews with the Contractors that include safety and environmental performance. Action plans will be agreed and documented to correct performance issues.
 - Feedback: Safety and environmental performance records shall be kept and used in future selection processes.

An example of a Category 3 Contractor would be a discrete project such as building of a new power station.

13 Category 4 Contractor Requirements

- 13.1 Category 4 Contractors are those who provide service delivery to remote communities engaged by the Remote Operations Business Unit. They are usually remote community councils. The General Manager of the Remote Operations Business Unit will determine classification of a Remote Operations contract.
- 13.2 In addition to Section 9, OHS and environmental requirements must be stated in the Contract specifications, including timing of OHS and environmental performance reviews. Category 4 Contractors must have a good understanding of hazards and risks associated with their activities and demonstrate this through a task-specific job safety and environmental analysis. The Action Officer shall be responsible to assist the Contractor to complete and understand the job safety and environmental analysis process.

Attachment 1 - Flow Chart to Identify Contractor Category



Attachment 2 – Contractor Category Requirements Summary

	Contract Process OHS and	Cat		Cat 2		Cat	Cat
	Environmental Requirements	1	High Risk	Med Risk	Low Risk	3	4
1	Scope Of Work Includes OHS and environmental Criteria	✓	✓	✓	✓	✓	✓
2	Pre-Tender Meeting Discussions Held		✓	✓		✓	
3	Selection Criteria Includes OHS&E Performance	✓	✓	✓	✓	✓	✓
3.1	Contractor OHS&E Management System Required		✓			√	
3.2	Contractor OHS&E Plan Required		✓	✓		✓	
3.4	Contractor Job Safety and Environment Analysis Worksheets Required		✓	✓	√	✓	✓
3.5	Statistical Past Performance Required		✓	✓		✓	
4	Contract Terms Include OHS and Environmental Requirements	√	✓	√	√	✓	√
5	Contractor Information Session to Review Safety		✓	✓		✓	
5.1	Review OHS&E Plan		✓	✓		✓	
6	Contractor OHS&E Orientation Induction Completed	✓	✓	✓	✓	✓	√
7	Contractor OHS&E Induction Completed	✓	✓	✓	✓	✓	✓
8	Contractor Site OHS and Environmental Incidents Reported	✓	✓	✓	✓	✓	✓
9	Contractors Workers Compensation Incidents Reported	√	✓	✓	✓	√	✓
10	Contractors Environmental Incidents Reported	√	✓	✓	√	✓	✓
11	Contractors Safety Meetings Held		✓	✓		✓	
12	Contractors included in Power and Water safety meetings	✓		✓	✓		✓
13	Periodic reviews of OHS&E performance completed	√	✓	✓	✓	✓	✓
14	Close out OHS&E performance review completed	√	✓	√	✓	√	✓
15	Safety and environmental performance records kept for future reference	✓	√	✓	✓	✓	✓

Attachment 3 – Contractor Occupational, Health, Safety and Environment Management System Questionnaire

	CATEGORY		QUESTION		YES	NO	Notes
1.1	Demonstrate Plans/	1		pany have a formal OH &S and/or an Environment Policy signed by the			IF NO to both an OH&S and
	Policies + Disciplined		CEO?				Environment - go to 1.1.3
	Conformance to Legislation	•	Please provide				
	Legislation	3		r Policy regularly revised/ updated? pany have a formal OHS&E System?			IF NO to both an OH&S and
		3		, ,			Environment - go to 1.1.5
			Please provide				
		4		r System regularly revised/ updated?			
		5	,	pany have a Safety and Environment Plan?			
			Please provide				
		6	,	system certified by an independent third party?			
1.2	Demonstrate compliance		Does your OHS	S&E System/Plan cover:			
	to Power and Water site 1 Emergency Procedures						
	OHS&E plans/policies.	2		Fire			
		3		Electrical Safety Procedures			
		4		Mechanical Safety Procedures			
		5		Noise			
		6		Lighting			
		7		Dust			
		8		Tagging/ Isolation/ Lockout Procedures			
		9		Dangerous Goods / Hazardous Substances			
		10		Hazard Reporting / Near Miss			
		11		Incident Notification and Investigation			
		12		PPE			
		13		Workplace Inspections			
		14		Hot Work Procedures			
		15		System Handling Standards			
		16		Lifting Gear Standards			
		17		Working at Heights Standards			
		18]	Confined Space Standards			
		19]	Risk Assessments / JSEA Standards			

	CATEGORY		QUESTION		YES	NO	Notes
		20		Toolbox Meetings			
		21		Employee Skills and Competencies			
		22		Ergonomics / RSI / Health Monitoring			
		23		Rehabilitation / Workers' Compensation			
		24		Drugs and Alcohol Standards			
		25		Use of company vehicles			
		26		Emission control			
		27		Land Management (eg. flora, fauna, erosion / sedimentation, acid sulphate soil)			
		28		Waste Minimisation and Disposal			
		29	Do you use an	electrical check system for equipment?			
				safety data sheet System/ file?			
		31	Has the inform	ation/ file been updated in the last six months?			
1.3	Demonstrate	1	Do you have				
	empowerment of		a:	Dedicated (full time) OHC and For improved according 19			
	employees to manage your safety and			Dedicated (full-time) OHS and Environment person identified?			
	environment process	3		Part-time OHS and Environment person identified? An external consultant for OHS and Environment matters?			
	•		Dass on Emplo				IF NO. go to 1.2.7
			IF YES	yee Safety Group / Committee exist?			IF NO - go to 1.3.7
		5	IF YES	Are documented outcomes / Action Lists produced?			
		6		Can all employees see what the outcomes are? For eg on noticeboard?			
			Do employees	can all employees see what the outcomes are? For eg on noticeboard?			
			have				
				Easy access to your Company OHS&E System?			
		8		Safety and environment objectives / targets & progress communicated to them?			
		9		Dedicated safety feedback sessions?			
		10		Safety and environment training?			Provide Evidence
		11		Toolbox Talks used for safety and environment feedback?			
		12		Access to Suggestion Box / Incentive Schemes?			
		13		Regular information sessions on Drugs and Alcohol?			
		14		Random tests for Drugs and Alcohol? (including sub-contractors)			
		15		A program to assess their fitness for work?			
		16		A system of employee safety awards?			

	CATEGORY		QUESTION		YES	NO	Notes
		17		First aid training?			
1.4	Commitment to joint site	1	Have you deve	loped Joint Safety and/or Environmental Plans with any key customers?			
	safety plans and policies.	2	environmental				
		3	-	your company exhibits best practice in this area?			
1.5	Demonstrate a	1		regular (monthly / quarterly) record of Safety Statistics?			IF NO - Go to 1.5.10
	measurement process for monitoring OHS&E		IF YES – indica	te which of the following are recorded:			
	internally and on Power	2		Medical treatments (eg MTIFR)			
	and Water sites.	3	_	Medical treatment trends across all your sites			
		4		Lost Time Injuries (eg LTIFR)			
		5		LTIFR trends across all your sites			
	6 7 8			Safety Observations / Trend Analysis?			
				Statistics in accordance with AS 1885			
				Safety incidents at each customer site			
		9		Drug and Alcohol testing / results			
		10	Do you conduc	t Safety and Environment Self-Audits on your own sites?			IF NO - Go to 1.5.14
			IF YES -				
		11		Can you provide formal evidence of results of these self-audits?			
		12		Provide evidence that follow up is performed to ensure issues are closed out?			Provide Evidence
				Do the results of the audits get published for all employees to see?			
			Do you:				
		Audit sub-contractors that you use?					
		15	1	Record & Investigate Near Misses?			
		16		Benchmark your safety and environmental performance against comparable companies?			
	Recommendation:						

Attachment 4 – Contractor Occupational, Health and Safety Risk Assessment Sheet

Maximum Risk	5	4	3	2	1	Minimum Risk			
Work Permits Required						Permits Not Required			
Complex Work						Simple Work			
Electricity						No Electricity			
Hazardous Area						Non Hazardous Area			
Confined Space						Open Area			
Work at Heights						Ground Level Work			
Isolation Required						No Energy Can Be Released			
Hazardous Substances						No Hazardous Substances			
Heat/Sun						Covered Work Area			
Gases/Dust/Odour Emissions						No Emissions			
Noise						No Noise			
Exposure to Machinery						No Machinery Hazards			
Complex Traffic Management Required						No Traffic Management Required			
Ergonomic Hazards						Satisfactory Ergonomics			
Fatigue (Shift Patterns)						Low Fatigue Risk			
Driving Long Distance						Minimal Driving			
Training Required						Fully Competent			
Animal/Insect Exposure						No Animal/Insect Exposure			
Add Points Allocated						<u>⊀Tot</u> al Points (Add All)			
Comments:									
Points Score :									
]						
Contract OHS Classification :		Hiç	gh		Me	edium Low			
Guideline : Points Score Boundarie	es					Dist. Obser'S setting			
Points Above 50						Risk Classification			
				-		High Risk			
30-50						Medium Risk			
Less than 30						Low Risk			

Attachment 5 – Contractor Environmental Risk Assessment Sheet

Maximum Risk	5	4	3	2	1	Minimum Risk		
Considerable earthworks						No earthworks		
High erosion risk						Work has no erosion risk		
Work impacts water						No work impacting water		
Hazardous wastes						No hazardous wastes		
Risk of weed transfer						No weed transfer risk		
Work in/near sensitive area (eg National Park, catchment)						Work not in/near sensitive area		
Work in proximity to heritage/cultural site						Not in proximity to heritage/cultural site		
Permit to access Aboriginal land required						No permit required		
Add Points Allocated						Total Points (Add All)		
Comments:		ı	ı	ı	ı			
Points Score :								
]					
Contract OHS Classification :		Hiç	gh		Me	edium Low		
Guideline : Points Score Boundarie	es			1				
Points						Risk Classification		
Above 30						High Risk		
18-30						Medium Risk		
Less than 18						Low Risk		

Attachment 6 – Contractor Induction Checklist

	Contract Name:								
	Contract Number:								
	Business Unit Contract Action Officer:	Dat	to:					- tec	
	Contract Action Officer.	Cat							
		1	High Risk	Med Risk	Low Risk	Cat 3	Cat 4	Completed	
1	Contractors introduced to contract action officer?	√	√	√	√	√	√		
2	Contractors provided with a copy of Power and Water Integrated Management System (IMS) Policy?	√	√	√	✓	√	√		
3	Principles of Power and Water IMS Policy explained to contractors?	√	√	√	✓	√	√		
4	OHS&E responsibilities explained to contractors?	√	✓	✓	√	√	√		
5	Site tour completed with contractors?	✓	✓	✓	✓	✓	√		
6	Site hazards discussed with contractors	✓	✓	✓	✓	✓	✓		
7	Site rules explained to contactors ?	✓	✓	✓	✓	✓	✓		
8	Power and Water safety and environmental standards explained to contractors?	✓	√	√	√	✓	√		
9	Power and Water permit to work system explained?		√	√	√	√	√		
10	Power and Water emergency procedures explained?	√	√	√	√	√	√		
11	Contractors identity card issued?	✓	✓	✓	✓	Х	Х		
12	Copy of contractors risk assessment sighted?	Х	√	√	Х	√	Х		
13	Copy of contractors JSEA process sighted?	Х	✓	✓	✓	✓	√		
14	Copy of contractors safe work and environmental procedures/plan sighted?	Х	√	√	Х	√	Х		
15	Copy of contractors incident investigation procedure sighted?	Х	√	√	Х	√	Х		
16	Contractors tools and equipment inspected?	✓	✓	√	✓	✓	√		
17	Competencies of contractor and employees checked?	√	√	√	✓	√	√		
18	MSDS for chemicals used by contractors available?	Х	✓	✓	√	√	√		
19	Contractors hazardous materials procedure sighted?	Х	✓	√	Х	√	Х		
20	Contractors safety and environmental training / meetings schedule sighted?	Х	√	√	Х	√	Х		
21	Contractors workplace inspection schedule sighted?	Х	√	√	Х	√	Х		
22	Contractors hazard reporting procedure sighted.	Х	√	√	Х	√	Х		
23	Contractors statistical reporting system sighted?	Х	√	Х	Х	√	Х		
24	Pollution incident reporting system sighted?	Х	✓	Х	Х	✓	Х		
Requi	red ✓ Ne	ot Requ	uired 1	X					