COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Oil and Gas: the contractor compliance guide.

What Australian law asks of oil and gas operators when contractors work on their facilities, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; the Offshore Petroleum and Greenhouse Gas Storage Act as at 24 August 2026 and its Safety Regulations as at 31 March 2026; sources read on 14, 17, and 18 November 2026

Includes
A checklist, a worked example, and a facility access map

Covers
Onshore and offshore production, gas processing and LNG, and pipelines, from construction to turnarounds; Commonwealth waters, Queensland, Victoria, and Western Australia named, South Australia's construction threshold given, and other states pointed to their own law

START HERE

The short version.

What is your business responsible for when contractors work on your oil and gas facilities, and what should you check before they start?

Most work on a gas plant, a pipeline, or a platform is done by other businesses. The scaffolder, the inspector, the welder, and the catering crew all work under your duty. Points 1, 3, and 5 state the model WHS laws: Victoria's OHS laws frame these duties differently, and at a Queensland operating plant the WHS laws apply only in part (page 9).

1 **Onshore, contractors' workers are your workers too.** A worker includes a contractor and a contractor's employee, and the duty, so far as is reasonably practicable, reaches workers the business engages, causes to be engaged, or influences or directs (page 5).[1]

2 **Offshore, the law requires compliance with the safety case.** In Commonwealth waters nobody may carry out a facility activity without a safety case in force that provides for it, or in a way contrary to it unless NOPSEMA has consented in writing to that conduct (page 14).[6]

3 **Hot work meets gas.** A business must manage the risks of a hazardous atmosphere, and of any ignition source in it that is not part of the work itself. Offshore, the safety case must provide for a permit to work system that covers hot work, isolation, and confined space entry (pages 18 and 14).[2, 6]

4 **A turnaround can be construction work.** The model's construction rules reach pipework, and fixed plant on which outage or overhaul work involves, or may involve, 5 or more businesses at any one time (r 290(2)). Construction work on or near pressurised gas distribution mains or piping, or chemical, fuel, or refrigerant lines, or in an area that may have a flammable atmosphere, is high risk construction work, which needs a SWMS before it starts (pages 18 and 21).[2]

5 **Approved once is not checked today.** A contractor approved for the panel says little about the scaffolder it sends today. Our recommendation: check each worker's licence, tickets, and training for the task, at the facility, before the work; for a high risk work licence, seeing it first is the law (page 3).[2]

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01 THE PRACTICAL TEST

The practical test is what you can show.

An operator approves a contractor once. Its people then work on plant, wellsites, and platforms the panel never sees. The question a regulator asks: who was on the facility, and what did they hold on the day?



An approved contractor is not a ready worker.

Most checks stop at the company. The law reaches further. Onshore, a contractor's employees who carry out work for the business are its workers too (section 7(1)),[1] and before anyone does high risk work that needs a licence, the business directing or allowing it must see written evidence of that licence (r 85).[2]

OUR RECOMMENDATION: ASSESSED ONCE, REVIEWED ON ANY CHANGE

The company

- ✓ Assessed for the panel or the turnaround, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Its safety documents and any prequalification, kept apart from each worker's licence
- ✓ Its workers compensation and public liability cover, and their dates (page 25)

OUR RECOMMENDATION: A STATUS CHECK AT EACH FACILITY, EACH VISIT

Each worker, at each facility

Gas plant | Wellsite | Platform

- ✓ Any high risk work licence, of the right class and current, sighted before the work: that one is law[2]
- ✓ The tickets the job needs, such as gas testing or confined space entry, and any offshore training the contract asks for
- ✓ Inducted to this facility, signed in, authorised for the task under the permit system, and supervised to match the work

Where it usually breaks.

Four common gaps, each one leaving an operator unable to show who was on the facility and what they held.

A list per contract.
The turnaround contract and the maintenance agreement each keep their own copy of the same certificates.

Checked by hand.
Expiry dates live in a spreadsheet, until a turnaround mobilises crew after crew in one week.

Sites with nobody there.
A wellsite or a valve station has no front desk, and the book at the plant gate cannot see it.

No view across the portfolio.
Nobody can say who is current on every facility, or who worked on last month's compressor trip.

One standard, every facility. One process for every contractor, matched to the facility, the task, and its law. Each gap above makes the verification step of an officer's due diligence harder to show: the model Act says due diligence includes taking reasonable steps to verify the provision and use of the business's health and safety resources and processes (section 27(5)(f)).[1]



02 THE DUTY HOLDERS

Every business on the facility holds a duty.

Onshore, work health and safety law puts its main duty on a "person conducting a business or undertaking", a PCBU, whether or not it is conducted for profit or gain. An operator, a titleholder, a principal contractor, and a turnaround contractor can each be one.[1] Offshore, the duties sit in a Commonwealth law of their own (page 12).

> **"A duty cannot be transferred to another person."**
>
> Model Work Health and Safety Act, section 14[1]

02 THE DUTY HOLDERS

Who the operator owes the duty to.

Three sections of the model Act decide it onshore. Read together, they reach well past the people on the operator's payroll.

Contractors are workers.

A person is a worker if they carry out work in any capacity for a PCBU, including as "a contractor or subcontractor" or "an employee of a contractor or subcontractor" (section 7(1)). [1]

Engaged or directed is enough.

The business must ensure, so far as is reasonably practicable, the health and safety of workers "engaged, or caused to be engaged" by it, and of workers whose activities in carrying out work are "influenced or directed" by it (section 19(1)). That can reach a contractor's subcontractor the operator never contracted with. [1]

Each facility carries its own duty.

Whoever manages or controls a workplace must ensure, so far as is reasonably practicable, that the workplace, the ways in and out, and anything arising from it are without risks to the health and safety of any person (section 20(2)). [1]

Who is on an oil and gas facility.

The operator or titleholder sits at the top. Everyone below it brings people onto the facility, and each needs a place in your checks.

The operator or titleholder
The PCBU: a producer, a gas processing or LNG plant operator, a pipeline licensee, or a terminal operator

Operations, maintenance, and projects
Parts of the business, not separate ones: each engages and directs its own contractors

The chief executive and the executive
Officers: the directors and company secretary, and anyone else who meets the officer tests, often including the chief executive (page 7); the role decides, not the title

Other duty holders on site
The principal contractor on a construction project (page 21), a drilling contractor running its own rig, and a neighbouring operator on shared plant

Contractors
Scaffolders, rope access teams, mechanical fitters, welders, electricians and instrument technicians, inspectors and testers, catering and housekeeping crews, cleaners, and security

Subcontractors and labour hire
The contractors' own subcontractors, agency staff, and apprentices

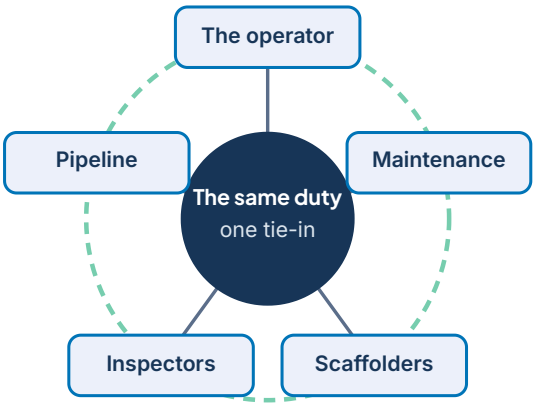
Makers and service partners
Compressor, turbine, and valve makers servicing their own equipment, and the maintenance partner that runs the plant's work program

Offshore is a different law. In Commonwealth waters the duties sit in Schedule 3 of the Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth), and the state WHS and OHS Acts its Safety Regulations list do not apply to a facility there (pages 9 and 12). [5, 6] Running a mine, or a gas-fired power station? The rest of the series is at complyflow.com/ebooks-reports.

02 SHARED DUTIES

Shared, but never handed over.

A tie-in on a working gas plant puts the operator, its maintenance contractor, the scaffolders, the inspection company, and the pipeline licensee at one valve. Four rules apply to every one of them.



Consult, cooperate, and coordinate

1. **Held at once, each to its own control.** "More than 1 person can concurrently have the same duty" (section 16(1)). Each keeps responsibility for its own duty and must discharge it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1]
2. **Worked together.** Each "must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter" (section 46).[1]
3. **Workers consulted too.** So far as is reasonably practicable, each consults the workers who carry out work for it, contractors' workers included, who are, or are likely to be, directly affected by a health and safety matter, and involves their health and safety representative where they have one (sections 47 and 48(2)).[1] Our view: a meeting between businesses does not meet it.
4. **Never transferred.** "A duty cannot be transferred to another person" (section 14). A contract term that tries to exclude, limit, or modify a duty, or transfer it, is void (section 272).[1]

> **"WHS duties cannot be contracted out to another party, such as a subcontractor."**
> Safe Work Australia, WHS duties in a contractual chain, fact sheet published 5 April 2022[12]

In Victoria.

In Victoria's OHS Act, the consult, cooperate, and coordinate duty between duty holders (s 35A) applies where a worker is a labour hire worker. The employer's duties to its independent contractors and their employees (s 21(3)) and to other people (s 23), and the duty of whoever manages or controls the workplace (s 26), still apply, each to the business that holds it (page 9).[4]

Three moments the duties overlap most.

Our view: shared duties are hardest to keep straight when control of plant or a facility changes hands. Each card is one of those moments, and what to settle in writing before it comes.

Construction to operations.

The principal contractor's control ends and the operator's begins. Settle the date, the open defects and limits, and whose permit system applies to each area in between.

The turnaround crews.

A short-term workforce arrives under the operator's permit system and leaves again. Settle whose people issue, hold, and close permits, and who checks each worker in.

Shared plant.

A tie-in can touch another operator's plant or the pipeline licensee's line. Settle who isolates what, who can refuse a return to service, and how the permits link.

03 OFFICERS

Due diligence is personal.

Under the model WHS Act, an officer of a PCBU "must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation" (section 27(1)). An officer can be convicted whether or not the business itself is (section 27(4)).[1]

Who is an officer.

Is the business a company, a government business, or a public authority?

A company director or secretary is an officer, and so is anyone who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business, who can significantly affect its financial standing, or whose instructions the directors usually follow (section 4, taking the Corporations Act meaning). For the Crown and for a public authority, an officer is a person "who makes, or participates in making, decisions that affect the whole, or a substantial part" of its business or undertaking (sections 247 and 252). What counts as a public authority is for your jurisdiction's Act.[1, 14]

Then

Name the officers by what they decide.

At an oil and gas business, that can include the chief executive, the board, and the executives who run operations, assets, and major projects: the role decides, not the title.

What an officer risks.

Under the model Act, a Category 1 offence, the most serious of the three categories of health and safety duty offence (conduct that, without reasonable excuse, exposes a person to a risk of death or serious injury or illness, with gross negligence or recklessness), carries a fine, up to 10 years in prison, or both, for an officer (section 31). Each jurisdiction sets its own penalties: check yours.[1] It is not the ceiling: the model Act leaves room for an industrial manslaughter offence, and Victoria and WA are two that have one (below, and page 9).[1, 4, 9] Offshore, Schedule 3 sets its own offences (page 13).

In Victoria.

The OHS Act 2004 (Vic) takes "officer" from section 9 of the Corporations Act (s 5(1)). An officer commits an offence where the body's contravention is attributable to the officer's failure to take reasonable care (s 144), and the workplace manslaughter offence also reaches officers (s 39G).[4]



03 OFFICERS

Due diligence includes taking reasonable steps to:

Each card gives one of the six steps the model Act lists, then what it can look like at an oil and gas business. The last, verify, checks that what (c) to (e) put in place is provided and used.

a

Know.

Acquire and keep up to date knowledge of WHS matters.

At an oil and gas business: a briefing when the offshore regime or your state's petroleum safety law changes.

b

Understand.

The operations, and their hazards and risks.

At an oil and gas business: knowing which plant is a major hazard facility, where the hazardous areas are, and which wellsites have nobody there.

c

Resource.

Make sure the business has, and uses, appropriate resources and processes to eliminate or minimise risks.

At an oil and gas business: one funded contractor process, used on every facility, for turnarounds and routine maintenance alike.

d

Hear and respond.

Make sure it has appropriate processes to receive and consider information on incidents, hazards, and risks, and to respond in a timely way.

At an oil and gas business: contractor incidents, gas releases, and near misses reported to the same place as staff ones.

e

Comply.

Make sure it has, and implements, processes for complying with its duties, such as reporting notifiable incidents.

At an oil and gas business: a written route for who tells which regulator, onshore and offshore, and how fast.

f

Verify.

Verify that the resources and processes in (c) to (e) are provided and used.

At an oil and gas business: a regular report that shows the checks happened, not only that the policy exists.

The model WHS Act, section 27(5)(a) to (f);[1] the examples are ours.

What the executive can ask for.

Our recommendation: four regular reports that show the checks happen, not only that they are planned, as evidence for the verify step above. One of them samples the work itself.

- Contractors mobilised this quarter, by facility and turnaround, and how many were checked before their first shift.
- Licences, tickets, and offshore training due to lapse in the next 30 days, and any whose status changed (suspended, cancelled, or conditions added), by contractor.
- Hot work, isolations, and confined space entries authorised, how many were checked at the job, and a sample of permits and SWMS compared with the work done.
- Incidents, dangerous occurrences, and near misses, which regulator was told, and the corrective actions still open past their due date.

04 WHERE THE LAWS DIFFER

Onshore, offshore, and a second layer.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws."[3] Offshore, a Commonwealth law takes over. Onshore, a petroleum law can sit beside the WHS law or, in Queensland at an operating plant, largely in its place.

Law	What it says	What it means for an oil and gas business
Offshore	Schedule 3 of the Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth) regulates occupational health and safety at facilities in Commonwealth waters, the waters beyond each state's coastal waters (Sch 3 cl 1; ss 8, 643). The state laws its Safety Regulations prescribe, each state's WHS or OHS Act among them, do not apply to a facility in that area (s 89; Safety Regulations s 3.32).[5, 6]	NOPSEMA's waters also include each state's and the Northern Territory's "designated coastal waters", the waters on the landward side of the offshore area (ss 643, 644). NOPSEMA regulates health and safety there only so far as that state's or the Territory's own petroleum law confers the functions (s 646(b)). This guide did not read those laws: settle which applies first (page 15).[5]
Queensland	The Petroleum and Gas (Production and Safety) Act 2004 (Qld). A facility used to explore for, produce, or process petroleum, a petroleum facility, and an authorised pipeline are each an "operating plant" (s 670).[7] Queensland's WHS Act does not apply to operating plant for a petroleum authority, except construction work other than commissioning and rigging a drill rig up and down; its hazardous chemical and major hazard facility rules still apply, and the P&G Act prevails on any conflict (WHS Act 2011 (Qld) sch 1 pt 2 s 2).[7, 17]	Each stage of the plant, maintenance or modification included, needs a safety management system before it begins (ss 672, 674; page 11). A facility classified as a major hazard facility under the WHS Regulation is an operating plant only to the extent the WHS Act does not apply to it (s 670(3)).[7]
Western Australia	Work Health and Safety Act 2020 (WA). It binds the Crown (s 10), and has its own industrial manslaughter offence (s 30A).[9]	Separate Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 apply; the safety case route is on page 10.[10, 21]
Victoria	Occupational Health and Safety Act 2004 (Vic). An employer's duties extend to independent contractors it engages, and their employees, on matters it controls or would control but for an agreement limiting that control (s 21(3)(b)), and, so far as is reasonably practicable, to people other than its employees (s 23); whoever manages or controls a workplace must, so far as is reasonably practicable, make it and the ways in and out safe and without risks to health, for matters it manages or controls (s 26).[4]	Victoria's OHS Regulations 2017 have their own major hazard facility Part: a person must not operate a major hazard facility unless it is licensed or registered (r 358).[8] Read Victoria's own Regulations for the rest.
Every other state and territory	Each jurisdiction's own version of the model WHS Act and Regulations.[3] In NSW, SafeWork NSW says the Work Health and Safety Regulation 2025 (NSW) commenced on 22 August 2025, and it refers to that Regulation's provisions as sections.[13]	The duties are broadly alike, but text and numbering can differ. Onshore petroleum and pipeline safety laws vary by state and are not summarised here: check yours.
The Commonwealth	Under the Security of Critical Infrastructure Act 2018 (Cth), gas and liquid fuel assets above the Act's thresholds are critical infrastructure: for example a gas processing facility of at least 300 terajoules a day, or any other capacity the rules prescribe, a critical gas transmission pipeline and its control room, and critical liquid fuel refineries, pipelines, and storage (ss 12(1), 12A(1)).[11]	Where Part 2A applies, a critical worker can be a contractor or subcontractor (s 5). It adds to the WHS duty; it does not replace it.[11]

Unless another law is named, section and rule numbers in this guide are the model WHS Act's and Regulations'. Your state's numbers may differ, and Victoria's is a different Act.[1, 2]

04 WHERE THE LAWS DIFFER

Western Australia: start with the accepted safety case.

WorkSafe WA says a safety case accepted by the regulator must be in force before petroleum or geothermal energy operations start, for construction, commissioning, operations, modifications, and decommissioning alike. It should cover all activities likely to take place, including those of all workers, and workers include contractors and subcontractors.[21]

1

Which law applies.

The Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 sit under the Work Health and Safety Act 2020 (WA). Confirm they apply to the facility and the work; this guide did not read the Regulations.

WA WHS Act 2020; subsidiary legislation[9, 10]

2

Who is who.

Identify the operator and the regulator. WorkSafe WA's petroleum safety inspectors carry out periodic inspections and assessments, and the operator must have a process to update the safety case and have it accepted before any prescribed activity starts. A new or increased risk it does not cover stops that work until the update is accepted.

WorkSafe WA, Safety cases[21]

3

The accepted safety case.

Confirm one is in force for the stage of the work, and that it covers the activities and the contractors: the type of facility, the safety studies, the safety management arrangements, and the emergency response plan.

WorkSafe WA, Safety cases[21]

4

Put it on the map.

Record the regulator, the safety case reference, and what it covers in the facility access map, one row per facility, and review it on any change to the work.

Our recommendation; page 29

The same gateway under three regimes.

Before a contractor starts, each facility has a gateway document. Which one depends on where the facility is.

Commonwealth waters.

A safety case NOPSEMA has accepted, in force and providing for the activity (Safety Regulations s 2.44(1)).[6] Page 14.

A Queensland operating plant.

A safety management system for each stage, made or adopted by the operator before the stage begins (P&G Act ss 672, 674).[7] Page 11.

Western Australia.

A regulator-accepted safety case in force before petroleum or geothermal operations start (WorkSafe WA).[21] This page.

Elsewhere, onshore petroleum and pipeline safety laws vary by state and are not summarised here: ask the operator which safety document governs, and who accepted it.

04 THE PLANT'S OWN SAFETY SYSTEM

Onshore, the plant's safety system comes first.

Large plants run on a safety system the law requires. Contractors work inside it.

Major hazard facilities.

Under the model Regulations, a facility where Schedule 15 chemicals are present, or likely to be, above their threshold quantity must be licensed, and the operator holds the licence (r 535). Above 10% of the threshold, the figure published in the model WHS Regulations as at 5 December 2025, the operator must notify the regulator as soon as practicable, and no more than 3 months after it becomes aware, or ought reasonably to have become aware, of it (r 536). The Chapter does not apply to a facility NOPSEMA regulates (r 530).[2]

A safety system.

The operator establishes a documented safety management system, and at a licensed facility uses it as the primary means of ensuring the health and safety of the workers it engages, causes to be engaged, or influences or directs (rr 558, 568(2)). Our reading: that takes in contractors' workers (section 7).[1, 2]

Visitors told.

Anyone other than a worker who enters a licensed facility is, as soon as practicable, told about the hazards that may affect them, the precautions to take, and what to do if the emergency plan is put into effect (r 571).[2]

Workers' part.

A worker at a licensed facility follows the operator's major incident procedures and the emergency plan, and immediately tells the operator of anything they believe may cause a major incident (r 576(1)). Our recommendation: brief every contractor on it.[2]

Queensland: a safety management system for each stage.

Under Queensland's Petroleum and Gas (Production and Safety) Act 2004, the operator of an operating plant, the person responsible for managing and ensuring its safe operation, makes or adopts a safety management system for each stage, and implements and maintains it (s 674(1)).[7] At such a plant the system, not the WHS Act, governs most work (page 9). Four parts of it touch contractors.

1

Every stage, before it starts.

Commissioning, operation, maintenance or modification, and decommissioning are each a stage, and so is construction work within an existing plant. No stage begins without a system that applies to it.

ss 672, 674(2)[7]

2

Contractors in the plan.

Where contractors or other plant will work in the same vicinity, the system describes, to the extent appropriate for the plant, the interactions, how they will be managed, the risks they bring and how those are controlled, and each operator's safety responsibilities.

s 675(1)(f)[7]

3

Skills and training.

A skills assessment of the minimum skills, knowledge, competencies, and experience for specific work, and a training and supervision program to match.

s 675(1)(g), (h)[7]

4

Inducted, and following it.

A site safety manager takes all reasonable steps to ensure each person entering the site gets an appropriate induction, and each person at the plant takes all reasonable steps to follow the system.

ss 693(a), 702[7]



05 OFFSHORE

Offshore, the law requires compliance with the safety case.

In Commonwealth waters, a facility runs on a safety case NOPSEMA has accepted. It must describe a safety management system that provides for every activity at the facility. Contractors work inside it, not beside it.[6]

> **"A person must not carry out a facility activity in Commonwealth waters if there is no safety case in force for the facility that provides for the activity."**
>
> Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024, section 2.44(1)[6]

05 OFFSHORE

What counts as a facility.

A vessel or structure at a site in Commonwealth waters, floating or fixed, is a facility while it is used, or being prepared for use, to recover, process, or store and offload petroleum, to house people working on another facility, to drill or service a well, to lay pipe, or to erect, dismantle, or decommission any of these, and a pipeline under a pipeline licence is one too. An offtake tanker, a tug, an anchor handler, or a supply vessel is not (Sch 3 cl 4).[5]

Who holds a duty offshore.

Each party has its own duty, and a "member of the workforce" includes contractors, whoever engaged them (cl 3). Reckless breach carries up to 3,500 penalty units for an individual, negligent breach up to 1,750 (cls 16B, 16C); a court may fine a company up to 5 times those amounts, unless a contrary intention appears (Crimes Act 1914 (Cth) s 4B(3)).[5, 18]

The operator.

The business NOPSEMA registered as operator (cl 5) takes all reasonably practicable steps to ensure the facility, and all work and other activities on it, are safe and without risk to the health of any person at or near it (cl 9(1)), with safe systems of work and the information, instruction, training, and supervision the workforce needs (cl 9(2)(d), (f)). Whenever anyone is aboard, so is someone with day-to-day management and control of operations (cl 6).[5]

Whoever controls the work.

A person in control of a part of the facility, or of particular work at it, takes all reasonably practicable steps to make that part, or that work, safe and without risk to health, with safe systems of work, and the information, instruction, training, and supervision of the people there (cl 10).[5]

Each contractor's principal.

A person owes its contractors the same obligations an employer owes its employees under cl 11(1) and (2), on matters it controls, or would have controlled but for an express contract term to the contrary and would usually be expected to control (cl 11(6)).[5]

Everyone on board.

A person at a facility takes all reasonably practicable steps not to create or increase a risk, and to cooperate with the operator (cl 15(1)), and complies with the safety case's safety requirements that apply to them (Safety Regulations s 2.48).[5, 6]

The titleholder. Where the operator is not a registered holder of the title, or its related body corporate, the registered holder takes all reasonably practicable steps to ensure the operator complies with, and is able to comply with, its health and safety obligations (cl 13C). Every registered holder of a petroleum title must also ensure that each well used, or prepared for use, under the title is designed, constructed, commissioned, altered, equipped, maintained, and operated, or suspended, abandoned, or closed off, so that risks to the health and safety of people at or near a facility from the well, anything in it or escaping from it, or the formations it reaches are as low as is reasonably practicable (cl 13A). A titleholder that learns of a significant new or increased risk tells the operator and NOPSEMA as soon as practicable (s 2.46(2)).[5, 6]

05 OFFSHORE

What the safety case must hold about people.

Three requirements of the safety case land on every contractor's crew. Each is the law. The offshore fatigue duty is on page 19.

Competence.

The safety case describes how the operator will ensure each member of the workforce has the skills, training, and ability for routine and non-routine tasks, in normal, abnormal, and emergency conditions (s 2.9).[6]

A permit to work system.

A documented system for all work, including hot work, cold work with physical isolation, electrical work with electrical isolation, confined space entry, work over water, and diving; it names who authorises and supervises work (s 2.10).[6]

The workforce is involved.

In developing or revising the safety case, the operator must show NOPSEMA that members of the workforce took part effectively, with documents to prove it (s 2.11).[6, 20] Our recommendation: keep evidence that contractor crews, and changes to their work methods, were part of it.

When the work changes, the safety case may too.

A new campaign, a contractor's new method, or a turnaround can take the work outside what the safety case provides for. Three questions decide it; each answer rests on the Safety Regulations.

1

Is it provided for?

No facility activity in Commonwealth waters without a safety case in force that provides for it.

s 2.44(1)[6]

2

Is it done as the safety case says?

No activity carried out contrary to the safety case in force, unless NOPSEMA has consented in writing. A significant new or increased risk that neither the safety case in force nor a revised safety case submitted to NOPSEMA and not refused provides for stops the activity.

ss 2.45, 2.46(1)[6]

3

Does it need a revision?

A revised safety case goes to NOPSEMA as soon as practicable when a modification is not adequately addressed, the activities differ from those it contemplated, or a control measure critical to safety is lost or removed, unless an exception applies, such as testing.

s 2.30(1), (2)[6]

The operator keeps a copy of the safety case in force in a readily accessible place for people at the facility (s 2.46A).[6] Our recommendation: before a campaign or turnaround, check the work list against it, and treat a contractor's new method as a change to test, not a form to file.

05 OFFSHORE

Getting people offshore.

Neither Schedule 3 nor the Safety Regulations names a sea survival or helicopter escape course, or an offshore induction (searched 14 November 2026). The law asks for competence and training suited to the work (cl 9(2)(f); s 2.9), and an accepted safety case binds the operator to the controls it describes.[5, 6] Our recommendation: hold each offshore training certificate and medical the operator or the contract asks for, with its expiry, on the same record as the worker's licences. The named certificate is not universally required by those provisions, so check the operator's safety case, its competence requirements, and your contract: a competence control in an accepted safety case is binding, even where no certificate is named. The certificate itself is Policy or Good practice.



Which waters, which law.

Where a facility sits decides which safety law applies to it. The line runs at the outer edge of each state's coastal waters.[5]

1

On land.

The state's WHS or OHS law, and in some states a petroleum safety law beside it or, in Queensland at an operating plant, largely in its place.

page 9[7, 17]

2

Coastal waters.

The waters on the landward side of the offshore area are each state's and the Northern Territory's "designated coastal waters". NOPSEMA regulates health and safety there only so far as that state's or the Territory's own petroleum law confers the functions; this guide did not read those laws.

OPGGS ss 644, 646(b)[5]

3

Commonwealth waters.

Beyond the coastal waters: Schedule 3 and the Safety Regulations apply to facilities, NOPSEMA regulates, and the state WHS and OHS Acts the Regulations list do not apply.

OPGGS ss 8, 89, 643; Sch 3 cl 1; Safety Regs s 3.32[5, 6]

Our recommendation: for every offshore campaign, write down which of the three applies to each facility and vessel before the crews mobilise, and keep it on the facility access map (page 29).

05 OFFSHORE

If something goes wrong offshore.

The operator tells NOPSEMA of an accident that causes death or serious injury, one that incapacitates a member of the workforce for at least 3 days, or a dangerous occurrence (cl 82; s 2.42(1)), on three clocks. [5, 6]

1

Notice.

As soon as practicable after it first happens, or after the operator becomes aware of it, with the material information then reasonably available; NOPSEMA wants it by phone, on its incident line.

s 2.42(3); NOPSEMA [6, 19]

2

Written report.

Within 3 days after it first occurs, with all it knows or can find by reasonable enquiry; more time only as NOPSEMA agrees. The facts, the emergency response, and the action taken and planned.

s 2.42(7) [6]

3

Root cause.

As soon as practicable, and no later than 30 days after it first occurs, unless NOPSEMA agrees otherwise. Copies of each notice and report are kept for 5 years.

ss 2.42(11), 2.23(5) [6]

Also on the operator. Nobody interferes with the site of a notified accident or dangerous occurrence before a NOPSEMA inspection is completed, except with an inspector's authority, when acting reasonably to rescue someone, keep the facility or people safe, or retrieve a body, or once 3 working days pass after the operator's notice and report without an inspector entering the facility (s 2.49). Diving starts only once the diving contractor has given the operator an accepted, current diving safety management system (s 4.3(2)). [6] Our recommendation: settle with each contractor who tells the operator of an event at once.

Harassment and bullying: a separate route.

An incident of sexual harassment, bullying, or harassment at the facility has its own notice and report, and no accident has to have happened first (s 2.46B). NOPSEMA says an alleged one is enough. [6, 19]

1

Alleged is enough.

The operator notifies NOPSEMA as soon as practicable after becoming aware, without waiting for an internal finding. No phone call is needed.

Safety Regs; NOPSEMA [6, 19]

2

De-identified.

The notice and the report each give a de-identified account (s 2.46B(2), (4)); reports go on NOPSEMA's own form. If there is any doubt whether an incident falls within these categories, NOPSEMA encourages notice.

Safety Regs; NOPSEMA [6, 19]

3

Written report.

Within 30 days of the notice, unless NOPSEMA approves longer. Our recommendation: agree with each contractor how its workers can raise a concern, and who tells the operator.

Safety Regs; NOPSEMA [6, 19]



06 PERMITS, ISOLATION, AND HOT WORK

Control the spark, prove the isolation.

On a live gas plant the job and its interfaces create the risk, and one interface is what the job might meet: gas from a line that was meant to be isolated, or a spark where a gas cloud can reach it.

> **A business "must manage risks to health and safety associated with an ignition source in a hazardous atmosphere at the workplace".**
>
> Model Work Health and Safety Regulations, regulation 52(1) [2]

06 PERMITS, ISOLATION, AND HOT WORK

What the law calls it.

The model Regulations do not define hot work. They define the atmosphere it is dangerous in, and what can ignite it. Onshore, the duty to manage the atmosphere is the law (r 51), and so is the duty to manage any ignition source in it that is not part of a deliberate process or activity (r 52).[2]

A hazardous atmosphere.

Flammable gas, vapour, mist, or fumes above the figure published in the model WHS Regulations as at 5 December 2025, 5% of the lower explosive limit (LEL); no safe oxygen level, or oxygen that increases the fire risk; or combustible dust that would make a hazardous area. Its risks must be managed (r 51).[2]

An ignition source.

"A source of energy capable of igniting flammable or combustible substances" (r 5). Its risks in a hazardous atmosphere must be managed, unless it is part of a deliberate process or activity (r 52). Welding, grinding, and cutting are ignition sources, but they are the work itself, so the duty behind hot work is the atmosphere duty in the first card and the primary duty (page 5).[1, 2]

A hazardous area.

One where explosive gas is present in a quantity that requires special precautions for the construction, installation, and use of plant (r 5). The zone classes come from Standards this guide did not read.[2]

A hot work permit, in five steps.

The law sets the duties named on each card; the steps and the permit form are our recommendation of how to show you met them. Offshore, the safety case's permit system sets the steps (page 14).

1

Plan.

Scope, SWMS, and the hazardous area mapped.

Law: r 299, where it is high risk construction work[2]

2

Isolate.

Lines isolated, drained, and proved, each point locked.

Law: the atmosphere duty above; the primary duty[1, 2]

3

Test.

Gas tested before and during the work.

Law: the atmosphere duty above; Good practice: the test record[2]

4

Authorise.

A named person signs the permit for this job.

Good practice: the permit form

5

Watch and close.

A fire watch, then the area checked and handed back.

Law: s 20(2); Good practice: the handback[1]

Where hot work meets construction work.

Where the work is construction work, work in an area that may have a contaminated or flammable atmosphere, or on or near pressurised gas distribution mains or piping, or chemical, fuel, or refrigerant lines, is high risk construction work (r 291(i), (j), (l)), and a SWMS is prepared before it starts (r 299).[2] In a confined space, no ignition source may be introduced if it could cause a fire or explosion there (r 73; page 20).[2]

06 PERMITS, ISOLATION, AND HOT WORK

What a permit will not show.

These checks sit around the permit: who isolated what, whether the worker is fit for this shift, and how the plant goes back into service. The duty behind each is the law; the forms are ours.[1]

Control	What it means on site	Status and source
Permits and isolations	Hot work, isolation, and confined space entry run under a permit, with a named person who issues and closes it. Our recommendation: isolations only by whoever has authority over that plant. The permit names the plant, how each point is locked, how the safe state is proved, and who approves reinstatement; permits are linked where another operator's or the pipeline licensee's plant is involved.	LAW the primary duty, page 5; the hazardous atmosphere, page 18[1, 2] GOOD PRACTICE the permit forms, the isolation authority, and linked permits
Fit for this shift	A current licence says nothing about today. Before a long or night shift, check each worker's recent hours, other employers included, their rest and travel, and the breaks planned. Give workers a way to report fatigue without pressure.	LAW onshore, the primary duty, page 5; offshore, s 3.1 of the Safety Regulations[1, 6] GOOD PRACTICE the pre-shift check
Handback and return to service	The plant is inspected; people, tools, and temporary controls are accounted for; isolations are removed or changed only through the authorised release process; required tests are completed; and the permit is closed before the authorised person accepts the plant back into service. Our recommendation: the operator's own isolation procedure governs each step. The record shows the tests, open defects, any limit in force, who accepts the plant back, and who can refuse it.	LAW the workplace without risks so far as is reasonably practicable, s 20(2)[1] GOOD PRACTICE the signed handback, accepted

Fit for the shift, and the next one.

Long turnaround shifts, often back to back, carry a fatigue risk. Offshore and onshore, the law reaches it differently.

Offshore: a duty of its own.

The operator, each employer, and anyone in control of a part of the facility or of particular work must develop and implement strategies to prevent or minimise the workforce's exposure to work-related conditions that may cause fatigue (Safety Regulations s 3.1).[6]

Onshore: the primary duty.

Our reading: fatigue sits in the primary duty (s 19).[1] Our recommendation: before each shift, check recent hours, other employers included, rest, and travel.

06 PERMITS, ISOLATION, AND HOT WORK

Vessels, tanks, and columns: confined spaces.

A confined space is enclosed or partly enclosed, not designed or intended primarily for people, at normal atmospheric pressure while anyone is in it, with a risk from its atmosphere, contaminants, or engulfment (r 5).[2] Our recommendation: classify each space and task; a vessel or tank is not one by default.

Before entry.

A competent person's written risk assessment (r 66); risk from connected plant and services eliminated, or where that is not reasonably practicable minimised, so far as is reasonably practicable (r 70); no ignition source that could cause a fire or explosion (r 73); signs at each entry (r 68); continuous communication and a standby person (r 69); first aid and rescue set, practised, and started from outside (r 74), with air-supplied respiratory equipment for a rescuer where the atmosphere is or may become unsafe (r 75).[2]

The atmosphere.

Purged or ventilated so far as is reasonably practicable, never with pure oxygen or an oxygen-enriched mix richer than air (r 71(1)). An acceptable oxygen or LEL reading alone does not show a safe atmosphere. A safe oxygen level while anyone works inside, from 19.5%, the floor published in the model WHS Regulations as at 5 December 2025, to 23.5% by volume, the ceiling published there (r 5); where that is not reasonably practicable and oxygen is below that 2025 floor, air-supplied respiratory equipment for each worker (r 71(2)). Flammable gas, vapour, or mist kept below 5% of its LEL (published 2025, model WHS Regulations), so far as is reasonably practicable; workers come out at 5% of the LEL (published 2025, same Regulations), unless a suitably calibrated, continuous-monitoring detector is used, and at 10% regardless (r 72, as published in the model WHS Regulations as at 5 December 2025).[2]

Toxic atmospheres.

Our recommendation: the written risk assessment names any toxic contaminant the task may meet, such as hydrogen sulphide or benzene, and sets the instruments, sampling, test locations, monitoring frequency, and stop-work readings. That detail is ours. The law: no one is exposed above the exposure standard (r 49), and the air is monitored where that is uncertain or needed to judge the risk (r 50).[2]

The permit.

No worker is directed in without a written entry permit, completed by a competent person, naming the space, the people allowed in, the time, and the controls, with space to acknowledge the work is done and everyone has left (r 67). It records the controls; it does not replace them. Entrants, anyone with a role in the work or its rescue who stays outside, such as the standby person, and their supervisors are trained, the record kept 2 years (r 76). The risk assessment is kept at least 28 days after the work and the permit until it is done; after a notifiable incident, each at least 2 years (r 77).[2]

07 SHUTDOWNS AND TURNAROUNDS

A turnaround is a project, not a busy week.

A shutdown brings in a large short-term workforce, puts many permits in one area, and runs on a tight clock. Three duties follow it.



When maintenance becomes construction work.

Construction work includes the maintenance, repair, alteration, and commissioning of a structure, and a structure includes pipelines; testing, maintenance, or repair work of a minor nature is not construction work (r 289; Act s 4).[1, 2] Three questions decide what follows; each answer is the law.

1

Is the plant within the construction rules?

Only where it is a ship or submarine, a pipe or pipeline, an underground tank, or plant designed or used to provide support, access, or containment during work in connection with construction work; where work on it relates to work carried out in connection with construction work; or where it is fixed plant on which outage or overhaul work involves, or may involve, 5 or more businesses at any one time. So a turnaround with 5 or more businesses working on fixed plant at once is within them.

r 290(2)[2]

2

Is it a construction project?

Under the model Regulations, construction work costing AU$250,000 or more has one principal contractor: the business that commissions it, unless it engages and authorises another. The principal contractor prepares a written WHS management plan before work starts, and takes all reasonable steps to get each SWMS before the high risk work starts. Victoria's principal contractor rules start at AU$350,000 (Vic r 332)[8] and South Australia's at AU$450,000[23]: below. The model figure is a model provision.

rr 292, 293, 309, 312[2]

3

Is every worker inducted?

Every construction worker holds general construction induction training, refreshed by construction work in the past 2 years where the training is older.

r 317[2]

In Victoria, the principal contractor duties apply from AU$350,000 (OHS Regulations 2017 (Vic) r 332); the owner is the principal contractor unless it appoints one and authorises it to manage or control the workplace (r 333), and the principal contractor prepares a health and safety co-ordination plan before the work starts (r 335). Read its own Regulations.[8] In South Australia, SafeWork SA says a construction project is work valued at AU$450,000 or more, and the PCBU that commissions it is the principal contractor by default.[23] Whether work is construction work is a separate question from the dollar trigger. In Queensland, maintenance is a stage of the plant that needs its safety management system (page 11), and the WHS Act applies there only to construction work, other than commissioning and rigging a drill rig up and down, beside the P&G Act; the hazardous chemical and major hazard facility rules still apply (page 9).[7, 17]

07 SHUTDOWNS AND TURNAROUNDS

Licences the crews bring.

Each high risk work licence below is sighted before the work, and a record of it kept at least 1 year after the work (r 85(1), (4)).[2] Electrical licences are the state's, and the last card is our recommendation.

Scaffolding.

Erecting, altering, or dismantling a scaffold from which a person or object could fall more than 4 metres is licensed, at basic, intermediate, and advanced levels; advanced covers hung and suspended scaffolds.[2]

Cranes and rigging.

Cranes are licensed by class, and rigging at three levels; every rigging licence needs the dogging course, and Schedule 4 makes it part of most crane licences.[2]

Boilers and steam.

Standard and advanced boiler operation are licensed classes, as are operating a steam turbine of 500 kW or more with a listed feature and a reciprocating steam engine with a piston over 250 mm (Sch 3 items 26 to 29).[2]

Electrical and hazardous areas.

Our recommendation: ask for the electrical licence your state requires for the task, and for demonstrated competence in the hazardous area where the work is. A gas-test ticket or a site induction proves neither. Licence categories vary by state, and this guide did not read them.

Pipe racks, columns, and tanks: work at height.

Much turnaround work is done at height. Where a fall from one level to another is reasonably likely to cause injury, the business manages the risk in this order. Each step is the law.[2]

1

On the ground first.

So far as is reasonably practicable, the work is done on the ground or on a solid construction (r 78(3)), and safe means of access and exit are provided (r 78(4)).

r 78(3), (4)[2]

2

Prevent, position, arrest.

If the risk remains: a fall prevention device, such as a scaffold platform with guardrails; if that is not reasonably practicable, a work positioning system; only then a fall arrest system.

r 79(3)[2]

3

A rescue that works.

With fall arrest, emergency and rescue procedures set, tested so they are effective, and workers given the information, training, and instruction to follow them.

r 80(2) to (4)[2]

Construction work with a risk of a fall of more than 2 metres is high risk construction work, which needs a SWMS before it starts (rr 291(a), 299).[2]

Digging near buried lines.

Before excavation starts, whoever manages or controls the workplace takes all reasonable steps to obtain current information on the underground essential services, which include gas, and chemical, fuel, and refrigerant lines, and gives it to the contractor who digs (r 304). Construction work in or near a trench deeper than 1.5 metres, on, in, or beside a road or other traffic corridor in use by traffic other than pedestrians, or where powered mobile plant moves is high risk construction work (r 291(g), (n), (o)).[2]

08 WORKED EXAMPLE

A tie-in during a gas plant turnaround.

A gas processing plant in Queensland, in a planned turnaround on a hot day. The maintenance contractor ties a new line into a header section that has been isolated, depressurised, and proved safe under the approved procedure, with scaffolders, inspectors, and caterers around it.

In Queensland the WHS Act applies at an operating plant only to some construction work, beside the P&G Act, and the WHS Regulation's hazardous chemical and major hazard facility rules still apply; other work runs under the P&G Act and the plant's safety management system (WHS Act 2011 (Qld) sch 1 pt 2 s 2; exact scope, page 9). The rule numbers below are the model's: this guide did not read Queensland's own WHS Regulation, so check it.[17]

What is live	Why it matters	What gets checked and kept
The plan	Maintenance is a stage of the operating plant, and it needs a safety management system that applies to it before it begins, describing how the contractors working in the same vicinity will be managed (P&G Act ss 672, 674(2), 675(1)(f)).[7]	The system for the turnaround stage, with each contractor's interactions and responsibilities; the site safety manager named
The tie-in	The new line is a pipe, so the tie-in is within the construction rules (r 290(2)); work on or near pressurised gas distribution mains or piping, or in an area that may have a flammable atmosphere, is high risk construction work, so a SWMS is prepared before it starts (rr 289, 291(i), (l), 299). A live hot tap is specialist engineered work, outside this example.[2]	The SWMS; the isolation record, each point locked and proved; the gas test record
The weld	Welding near the header puts an ignition source into an area where gas may be present; the business manages the hazardous atmosphere (r 51) and its primary duty (s 19), and r 52 covers any other ignition source there.[1, 2]	The hot work permit, linked to its isolation permit; gas tests before and during; the fire watch; the handback
The scaffold	A scaffold from which a person could fall more than 4 metres is put up by a licensed scaffolder, the licence sighted before the work (r 85; Sch 3).[2]	Licences sighted and recorded, kept at least 1 year after the work; the scaffold handover
The vessel entry	An inspector enters a drained separator. If the entry is part of the tie-in's construction work and the separator is a confined space: a written permit (r 67), a standby person (r 69), no ignition source (r 73), and the atmosphere kept within r 71 and r 72. If it is not, the plant's safety management system governs it (P&G Act ss 674, 702).[2, 7]	The entry permit, the risk assessment, the readings, the rescue plan, and the entrants' training record
The catering crew	New to the plant for the turnaround. The site safety manager takes all reasonable steps to ensure each person entering the site gets an appropriate induction (P&G Act s 693(a)).[7]	The induction record and sign-in

08 WORKED EXAMPLE

If something goes wrong at the plant.

The same turnaround, a serious injury at the separator. Three questions decide who tells whom, and how fast.

1

Is it a prescribed incident?

At a Queensland operating plant the chief inspector must be told of a death, a serious injury or illness, a dangerous incident, and a fuel gas network incident causing, or with serious property damage that could cause, a critical loss of supply. Our recommendation: put those four questions to every event, near misses included.

RSHQ, Prescribed incidents guideline v.8, 14 August 2026; Petroleum and Gas (Safety) Regulation 2018 (Qld) s 10 [22, 25]

2

Who calls, and when?

The operator notifies the chief inspector by telephone as soon as possible after becoming aware, and in the approved form within 2 business days of the incident, and, until an inspector directs otherwise, restricts access to the site and protects anything there from tampering.

P&G Act ss 706, 707 [7, 22]

3

What about the WHS notice?

For the construction work, the WHS notice is given immediately, by the fastest possible means; one notice is enough where s 38(1A) is adopted. The site is preserved, so far as is reasonably practicable, until an inspector releases it (model s 39(1)): check Queensland's wording.

s 38(1), (1A), (2); s 39(1) [1]

Agree it first. Settle with each contractor who calls, and who preserves the site. An agreed caller does not take over another duty holder's duty: each business keeps its own (page 6). [1]

The same day, on paper and joined up.

The same checks, done two ways. On the left is what a regulator usually finds; on the right is what it should find.

On paper

Licences checked at tender; the hot work permit in a folder, apart from its isolation; nobody knows who is in the separator.

Joined up

Licences and tickets checked at the gate; the hot work permit carries its isolation; the entry permit shows who is inside; a live list of who is on the plant.

09 THE RECORD

What to hold for every contractor.

Numbers are the model WHS laws' unless another law is named; check your state's (page 9), and offshore Schedule 3 and the Safety Regulations (page 13).

LAW Act, Regulations, or Rules **POLICY** policy or contract terms

REGULATOR guidance **GOOD PRACTICE** our way; a contract may still require it

Level	What to hold	Status and source
The company	Its safety management system documents and any prequalification your facility requires, held apart from each worker's licence; public liability and any other cover the contract asks for, with expiry dates; its workers compensation cover under its own scheme	**POLICY** your facility's rules and the contract
	Where the asset is a critical infrastructure asset: whether the contractor supplies critical workers	**GOOD PRACTICE** where Part 2A applies to the asset; definition, SOCI Act s 5; page 9 [11]
The worker	Written evidence of any high risk work licence (scaffolding, rigging, dogging, crane, boiler, or steam turbine), sighted before the work and kept at least 1 year after it; class, scope, conditions, and status checked; reviewed on a suspension, an incident, or a change of scope; a renewal does not re-approve on its own	**LAW** r 85(1) and (4); Sch 3 [2] **GOOD PRACTICE** the status check
	General construction induction training for construction work; with fall arrest, training in the rescue procedures; confined space training, its record kept 2 years; gas testing and other tickets the job needs; offshore, the training and medical the operator or contract asks for, with expiry dates	**LAW** rr 317, 80(4), 76 [2] **POLICY** the contract's tickets and offshore training
	Offshore, how the operator ensures each worker's skills, training, and ability for the tasks (in the safety case), and competence in the permit to work system	**LAW** Safety Regulations ss 2.9, 2.10(2)(c) [6]
The facility and the visit	An induction suited to the work and its risks (in Queensland, s 693); at a major hazard facility, the hazards, precautions, and emergency actions for visitors; on a construction project, the principal contractor's WHS management plan; a SWMS for high risk construction work; a written confined space entry permit and its risk assessment; for lone or remote work, the check-in plan; sign in and out by facility	**LAW** rr 39, 571, 309, 299, 67, 66, 77, 48; Qld P&G Act s 693 [2, 7] **GOOD PRACTICE** the induction form and sign-in
	The hot work and isolation permits, linked; the gas test record; and the signed handback	**LAW** duties on pages 18 and 19 [1, 2] **GOOD PRACTICE** the forms
	Keep each record for the longest of the legal minimum, any government records rules that bind you, and any incident or claim hold. The employee records exemption covers only an employer's own employees' records, not a contractor's workers'. Hold only what the check needs (status and expiry, not clinical detail), limit access, store it securely, and destroy or de-identify it when no longer needed, unless a legal hold applies (APP 11) [24]	**GOOD PRACTICE** the retention schedule **LAW** Privacy Act 1988 (Cth) s 7B(3) [16] **REGULATOR** OAIC, employment [15]; APP 11 [24]
The incident	Onshore, under the model Act as at 5 December 2025, where adopted: violent incidents notifiable too; notifiable incidents and suicides immediately, extended absences within 14 days, one notice per event; each record kept at least 5 years; the site preserved, so far as is reasonably practicable, until an inspector releases it (s 39); the notifier and the site controller tell each other at once (s 39A). At a Queensland operating plant, the chief inspector's call and form (page 24). Offshore, the notices and reports on page 16, copies of the accident and dangerous occurrence ones kept 5 years	**LAW** ss 35, 38(1), (1A), (7), 39, 39A, where adopted [1] **LAW** Qld P&G Act ss 706, 707 [7] **LAW** Sch 3 cl 82; Safety Regulations ss 2.42, 2.23, 2.46B, 2.49 [5, 6]

09 CHECKLIST

Before a contractor starts.

Each line is tagged: the law, or our recommendation. Fill in the status, owner, review date, and evidence as you go.

Check	Status and owner	Review date and evidence ref.
Before engagement		
☐ We know which law and regulator apply to each facility, onshore, in coastal waters, or in Commonwealth waters, and whether a petroleum safety law adds to it or, as in Queensland at an operating plant, replaces it for work other than construction (the exceptions are on page 9), and whether the major hazard facility rules apply; in Western Australia, that the accepted safety case covers the work and its contractors (page 10). **Law, pages 9, 10, 11, and 15** **Regulator** WorkSafe WA, for Western Australia **Good practice** the facility access map, page 29		
☐ The company's safety documents, insurance, and workers compensation cover are on file, with dates, apart from its workers' licences. **Policy** the contract, page 25		
☐ Offshore, a safety case in force covers this stage and activity, the work follows it, and any change it needs is documented and resolved before the work is authorised (a revision submitted and not refused counts only for a significant new or increased risk); in Queensland, the plant's safety management system covers this stage and these contractors. **Law, pages 11 and 14**		
☐ On a construction project, the principal contractor is known and has its WHS management plan and each SWMS before the work; every construction worker holds general construction induction, refreshed by construction work in the past 2 years. **Law, page 21** **Good practice** naming it in the contract		
Before the first shift		
☐ Each worker's high risk work licence and tickets are on file, with class, scope, conditions, and current status; offshore training and medicals the contract asks for, with expiry dates. **Law, pages 3 and 22 (licences)** **Good practice** the status check **Policy** the tickets and offshore training		
☐ A SWMS for each kind of high risk construction work, including falls over 2 metres, work in or near a confined space, on or near pressurised gas distribution mains or piping or chemical, fuel, or refrigerant lines, in or near a trench deeper than 1.5 metres, where powered mobile plant moves, on or near energised electrical installations or services, and in an area that may have a flammable atmosphere. **Law, pages 18, 21, and 22, r 291(a), (f), (g), (i), (j), (k), (l), (o), r 299** versions and dates		

09 CHECKLIST

Before the first shift, and on the day.

The checks before work begins and at the job itself. Each line is tagged: the law, or our recommendation.

Check	Status and owner	Review date and evidence ref.
Before the first shift, continued		
☐ Before any digging, the current underground services information obtained and given to the contractor who digs. **Law, page 22 (r 304)** **Good practice** the services enquiry and its date		
☐ Induction to this facility covers, at a major hazard facility, its hazards and emergency actions, and a briefing to report anything that may cause a major incident. **Law, r 39 and page 11 (r 571 for visitors)** **Good practice** the induction record and the major incident briefing		
On the day, at the facility		
☐ Every worker signed in and out, and any high risk work licence sighted before the work, not after. **Law, page 3 (licences)** **Good practice** sign-in by facility		
☐ Hot work: the hazardous atmosphere managed, and any other ignition source in it; lines isolated and proved; gas tested before and during; the permit authorised and linked to its isolation; a fire watch; the area handed back. **Law, page 18 (the atmosphere duty, the primary duty, and other ignition sources)** **Good practice** the permit, the test record, and the handback		
☐ Isolations by the authority for that plant, each worker fit for this shift, and the handback accepted before return to service. **Law, page 19** **Good practice** the checks, the permit, and the handback		

09 CHECKLIST

On the day, and after.

The checks at the job itself, and the standing ones. Each line is tagged: the law, or our recommendation.

Check	Status and owner	Review date and evidence ref.
On the day, at the facility, continued		
☐ At height: ground first; prevention before arrest; with fall arrest, a rescue plan tested and workers trained in it. **Law, page 22 (rr 78 to 80)** **Good practice** the rescue drill record		
☐ A confined space classified first; if it is one: written risk assessment, connected plant isolated, no ignition source, signs at each entry, standby and communication, purging or ventilation that never uses pure oxygen or an oxygen-enriched mix richer than air, a safe oxygen level or air-supplied respiratory equipment, flammable gas within the r 72 limits or workers out, rescue equipment and practised rescue, trained entrants, standby people, and supervisors, and a written entry permit. **Law, page 20, rr 66 to 77** permit numbers		
☐ A worker alone or remote, at a wellsite or a valve station, has a way to call for help that works there; someone watches the check-ins and escalates a missed one. **Law, r 48** **Good practice** who watches, and the escalation		
If something goes wrong, and standing		
☐ We have agreed with each contractor who gives the notice, onshore to the WHS regulator immediately or, at a Queensland operating plant, to the petroleum chief inspector (page 24), and offshore through the operator to NOPSEMA; who preserves or restricts access to the site; each business keeps its own duty. **Law, pages 16 and 24** **Good practice** the agreed route		
☐ Officers receive a regular report that verifies the checks happen: overdue actions, and a sample of permits and SWMS checked against the work done. **Good practice; verifying is part of due diligence, s 27(5)(f)**		

09 TEMPLATE

The facility access map.

One row per facility; the first row is an example. It settles, before the job starts, which law applies, who may work there, what they must hold, and who has to know.

Facility	Which laws, which regulators	Whose safety system	Who authorises access and work	Hazardous areas, permits, and spaces	Training and tickets	Alone, after hours, and who reports
Example: an onshore gas processing plant in Queensland, in a turnaround	*P&G Act and the petroleum regulator for the plant; the WHS Act and the WHS regulator for the turnaround's construction work, beside the P&G Act (scope: page 9); major hazard facility rules if classified as one*	*The operator's safety management system for the maintenance stage, with each contractor's interactions in it*	*The site safety manager; permits issued by the operator's permit officers, isolations by the plant's authorised isolators*	*The process area mapped as a hazardous area; hot work linked to isolation; two separators assessed as confined spaces*	*Construction induction, licences sighted, gas test tickets, the plant induction*	*No lone entry; wellsite visits check in with the control room; the operator gives the notice, agreed with each contractor; each keeps its own duty. Reviewed 01/11/2026*

How to keep the map true.

A map nobody keeps current is worse than none, because the gate trusts it. Our recommendation: three habits keep it right, and each row carries a status, an accountable owner, a review date, and an evidence reference.

Fill it in together.

Operations, maintenance, safety, and procurement should agree each row. Where they disagree, there is a gap in who does what, and the duty does not wait for it to close.

Review it on any change.

A turnaround, a new maintenance partner, a change to the safety case, or a new facility changes the row. Give each row a review date.

Keep it with the record.

The map is only useful if the gate, the control room, and the on-call manager can see it when a contractor arrives.

10 ONE STANDARD, MATCHED TO EACH FACILITY

One standard, matched to each facility.

Apply the relevant checks at each facility, using its legal regime and work scope, onshore and offshore, from the first day of construction to the last shift of a turnaround.

Questions to ask about how you manage it today.

1. If a regulator asked who worked on the header tie-in last Tuesday, and what each held, how long would the answer take?
2. When a turnaround brings in new crews, who checks each worker before their first shift, not after?
3. Does each hot work permit show the isolation it relies on, and the gas test behind it?
4. Do you hold a contractor's prequalification and each worker's licence separately, so one is never taken as proof of the other?
5. Offshore, who checks the work list against the safety case before a campaign starts?
6. When a scaffolding licence or an offshore training certificate lapses, who finds out before the next shift?
7. Have you agreed with each contractor who reports an incident, and to which regulator?
8. How many hours a month go on chasing certificates?

What to look for in a system.

Seven capabilities that keep these checks working at each facility. A system holds evidence of the checks; it does not prove the controls worked on the day.

- **Company and worker, kept apart.** A contractor's approval and each worker's clearance, on one record but never confused.
- **Requirements matched to the facility.** Offshore and onshore requirement sets kept apart, with extras where a platform or plant needs them.
- **Expiry tracked for you.** Offshore training and medicals tracked to their own expiry, apart from onshore licences, with reminders sent before anything lapses.
- **A check at the gate.** A QR code or kiosk at the plant gate or the platform muster point, which also works at unmanned gates and remote sites.
- **Permits on the same record.** Hot work, confined space, and isolation permits, with the isolation linked to the permit that depends on it, and each closed with a time-stamped record.
- **Inspections that close.** Every failed item becomes an owned, dated action.
- **A record for the audit.** One searchable record per facility, with scheduled reports.

START SMALL

Start with one facility.

Take one facility or the next turnaround, fill in its row of the access map on page 29, and run the checklist on pages 26 to 28 against its contractors. Close the gaps first: worker ready, work authorised, controls in place. Then ask anyone offering a system to show each point above on your own facilities.

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This guide is general information, not legal advice. It summarises the model Work Health and Safety Act and Regulations published by Safe Work Australia (as at 5 December 2025), the Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth) and its Safety Regulations 2024, Queensland's Petroleum and Gas (Production and Safety) Act 2004, its Petroleum and Gas (Safety) Regulation 2018 (s 10), and Schedule 1 of its Work Health and Safety Act 2011, Victoria's Occupational Health and Safety Act 2004 and its OHS Regulations 2017 (rr 332, 333, 335, and 358), the Western Australian WHS Act 2020 and WorkSafe WA's safety case guidance, the Security of Critical Infrastructure Act 2018 (Cth), the Corporations Act 2001 (Cth) s 9AD, the Crimes Act 1914 (Cth) s 4B(3), the Privacy Act 1988 (Cth) s 7B(3), and regulator guidance, as read on the dates above. Each jurisdiction enacts its own WHS and petroleum safety law, so text and numbering can differ. For a decision about your own facilities and contractors, read the law that applies to you and take legal advice. It is a contractor management guide, not a technical manual.

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