



Department of **Energy, Mines,
Industry Regulation and Safety**



GUIDE

Management of change

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Reference

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Foreword

Western Australia's work health and safety (WHS) legislation came into force in March, 2022. This resulted in the amendment of the various petroleum Acts and the repeal of the associated regulations so that all onshore and offshore petroleum, pipeline and geothermal energy operations are now subject to the requirements of the:

- *Work Health and Safety Act 2020* (the WHS Act)
- Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 (WHS PAGEO Regulations).

A key responsibility for the WorkSafe Group (WorkSafe) of the Department of Energy, Mines, Industry Regulation and Safety (the Department) continues to be the ongoing risk management and safety requirements for the onshore and offshore petroleum, pipeline and geothermal energy operations. To support these requirements, the guides previously developed have been updated to provide support and assist operators to meet their commitments under the WHS Act and WHS PAGEO Regulations.

Application

This Guide is a non-statutory document provided by WorkSafe to assist persons subject to duties under the WHS Act and requirements to conduct audits of the safety management system as prescribed by the WHS PAGEO Regulations.

It has been developed to provide advice and guidance to operators to meet the WHS Act and the WHS PAGEO Regulations requirements administered by WorkSafe.

Who should use this Guide?

You should use this Guide if you are:

- the operator of onshore or offshore petroleum, pipeline or geothermal energy operations under the WHS Act
- responsible for maintenance of a safety management system and in particular management of change.

WHS legislation

Under the WHS Act, the WorkSafe Commissioner is responsible for performing the functions and exercising the powers of the regulator. Each safety document must be submitted for acceptance by the regulator.

WorkSafe assists the regulator in the administration of the WHS Act and the WHS PAGEO Regulations, including the provision of inspectors and other staff to oversee compliance with the legislation.

For facilities outside the Western Australian waters, the WHS Act does not apply and guidance should be sought from National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). If a vessel does not fall under the definition of “facility” in the Act, operators should contact the Australian Maritime Safety Authority and Department of Transport.

No petroleum or geothermal operations can be conducted on any onshore or offshore petroleum, pipeline or geothermal energy operations unless the facility has an operator registered in accordance with the requirements of WHS PAGEO Regulations.

The WHS PAGEO Regulations provided for transitional provisions in relation to facility operators and safety cases in place or submitted before the commencement of the WHS legislation.

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1 Introduction

This Guide has been developed to provide operators with assistance to meet the requirements for management of change (MoC) within their safety management system (SMS).

For the purpose of this Guide, the term “safety case” is used to cover all of the safety documents referred to in the WHS PAGEO Regulations.

The term “facility” covers offshore and onshore facilities and pipelines, including above ground structures

The objective of this Guide is to provide clarity on areas of the legislation which may be ambiguous or open to interpretation.

1.1 Aims and outcomes of management of change

WHS Act Section 19

Duty of care

WHS PAGEO Regulations r. 38

Involvement of workers

Whilst not specifically mentioned within the WHS Act or the WHS PAGEO Regulations, the process of the management of change is a key requirement within the safety case and, in particular, the safety management system.

The operator has the responsibilities of the person conducting a business or undertaking (PCBU) as defined within the WHS Act and has a primary duty of care to ensure, so far as is reasonably practicable, that workers and other persons are not exposed to health and safety risks arising from work carried out as part of the business or undertaking.

The main aims and outcomes of management of change are to:

- provide the operator and workers with sufficient knowledge, awareness and understanding of the risks from health and safety hazards and, in particular, the risks from major accident events (MAEs) to be able to safely control risks that have been identified, for example, from risk assessments, incident investigations and the introduction of new processes
- provide a basis for identifying, evaluating, defining and justifying the selection or rejection of control measures for eliminating or reducing risk and to lay the foundations for demonstrating that the risks have been reduced so far as is reasonably practicable (SFAIRP)
- provide an effective process for the management of change to ensure that such changes are not going to introduce additional hazards or risks to the operations and will ensure that the health and safety of workers is maintained.

1.2 Linked guides

The following guides provide information to assist operators with risk assessment, risk management and the development of the formal safety assessment (FSA) of the safety case.

- *Hazard identification*
- *Demonstration of risk reduction SFAIRP*
- *Human factors fundamentals for petroleum and major hazard facility operators*
- *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operators*
- *Identification of major accident events, control measures and performance standards*

These five guides, together with this Guide, form an inter-related suite of information for effective hazard identification, risk assessment and management, including identification of MAEs and control measures.

2 Management of change

WHS PAGEO Regulations r. 32(4)(j)

Operation description, formal safety assessment, safety management system and emergency response plan

WHS PAGEO Regulations r. 72(3)(c)(ii)

Contents of Diving safety management system (DSMS)

While there is no specific regulatory requirement for an MoC system (other than in a DSMS), the safety management system of an operation must provide for any matter necessary to ensure that it meets the requirements and purposes of the WHS PAGEO Regulations.

MoC is therefore a key area that can be used to maintain compliance with the WHS Act and the WHS PAGEO Regulations.

The MoC system ensures all proposed changes are identified, documented, reviewed and approved prior to implementation. It is a key risk management system used to ensure health and safety risks are considered and managed before any changes are implemented. The system can be a critical tool in identifying changes to the organisation's risk profile.

Figure 1 shows the basic steps that should be in place for MoC.

The minimum MoC system requirements should include:

- a process for identifying, initiating and documenting the need for change
- a methodology for evaluating the change which considers the:
 - technical benefits of the proposed change
 - assessment of the risks associated with the proposed change and any likely impact it may have on the health and safety of workers
 - identification of potential consequences on operations, contract schedules or costs of the change
 - potential impact of not approving the proposed change
 - means for risk based prioritisation of the proposed change; for example, high priority requiring immediate attention
- a process that identifies the relevant authority who reviews the evaluation of the proposed change and makes the decision on the approval of the change
- a process for the implementation and verification of an approved change
- a process to document and communicate information associated with the change to all relevant parties and workers.

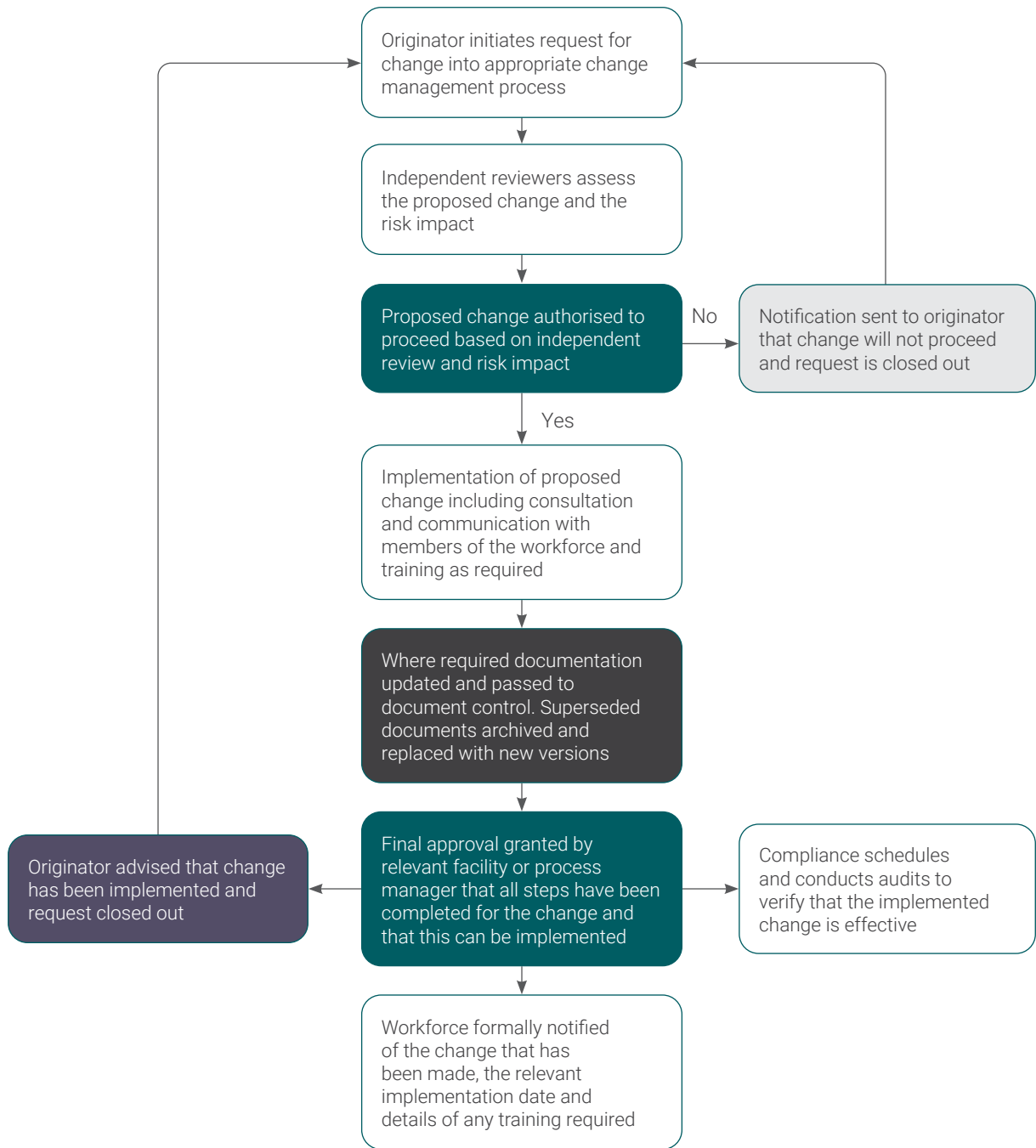


Figure 1 Overview of management of change

MoC systems should provide for permanent, temporary and emergency changes and include a process that ensures appropriate and competent reviews and approvals prior to implementation of any change. The system is an essential element of an SMS which should be integrated into the overall SMS and include requirements for consultation, communication and, where required, any additional training of workers.

Changes may introduce new major accident event (MAE) hazards or increase risk control measures for existing MAEs. Effective management of all changes to a facility, including operational, organisational, and procedural changes, should be in place.

The requirement for MoC is also a key factor in many of the standards used by operators (Appendix 2).

A robust MoC system can be used to identify and meet regulatory acceptance requirements for the review and development of safety cases. For example:

- to identify required periodic review of the safety case in force
- to determine the requirement for a new safety case rather than revision of an existing document, often identified through a safety case impact assessment process within the MoC system
- if required, to aid in scoping the scale of change within a facility or the associated SMS that subsequently results in significant change requiring an interim review and update of the safety case.

It is the responsibility of the operator to identify those changes which require a revision of the safety case, not the regulator. If inspectors identify changes in circumstances which require a revision of the safety case, this is generally a situation where non-compliance has been identified. The operator should plan well in advance of any proposed change to ensure the safety case is reviewed and updated with all relevant changes.

The established MoC system should ensure that changes will be analysed, evaluated and communicated to all workers before implementation.

2.1 Involvement of workers

WHS PAGEO Regulations r. 38
Involvement of workers

Timely involvement of relevant workers in a proposed change is critical to the successful implementation of that change.

Once a required change has been identified, relevant workers should be consulted to provide input for the change. This gives those workers a level of ownership in the change which can greatly assist in communicating the changed requirements to others and providing any additional training that may be required.

Review and update of procedures and work instructions should also involve the workers who use those documents during their day to day duties. This not only ensures ongoing support for the changes, but also that those changes have been reviewed by the people with the required level of expertise and knowledge for conducting the tasks covered by the updated documentation.

Details of worker involvement should be documented. For more information, refer to the *Involvement of workers: Guide* and the *Work health and safety consultation, cooperation and coordination: Code of Practice*.

2.2 Human factors

When managing change operations and the workplace generally, it is important that the human factor is taken into account, assessed as to the risk applicable and appropriate controls put in place to manage the risk.

Human factors focuses on understanding how human performance is shaped by conditions within the system.

Integrating human factors into the MoC process is important for achieving error-tolerant systems. MoC documentation should clearly demonstrate how human factors have been considered in the management of risk. It should include and demonstrate how various aspects of human performance in the areas of prevention, initiation, detection, control, escalation, mitigation and emergency response have been considered when identifying, assessing and controlling for hazards and MAEs.

MoC documentation that does not demonstrate the consideration of human factors may not be sufficient to demonstrate the risks associated with hazards and MAEs have been reduced SFAIRP.

For further information, refer to the *Guide: Human factors fundamentals for petroleum and major hazard facility operators* and the *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operations*.

2.3 Psychosocial hazards

WHS Act s. 19

Primary duty of care

As the person conducting a business or undertaking (PCBU), the operator has a primary duty of care to ensure, so far as is reasonably practicable, that workers and other persons are not exposed to health and safety risks arising from work carried out as part of the business or undertaking. Health, in the WHS Act, is defined as physical and psychological.

Psychosocial hazards at work are aspects at work and work situations which can harm psychological and physical health. Psychosocial hazards can stem from:

- the way the tasks or job are designed, organised, managed and supervised
- tasks or jobs where there are inherent psychosocial hazards and risks
- the equipment, working environment or requirements to undertake duties in physically hazardous environments
- social factors at work, workplace relationships and social interactions.

Psychosocial hazards can arise from, or be exacerbated by, changes in the workplace. Therefore, the operator must have systems in place for preventing and managing psychosocial hazards such as stress, fatigue, burnout, bullying, harassment, violence and aggression, discrimination and misconduct.

For more information, refer to the codes of practice: *Psychosocial hazards in the workplace*, *Mentally healthy workplaces for fly-in fly-out workers in the resources and construction sectors* and *Workplace behaviour*. These three codes of practice detail how to assess and manage psychosocial hazards and risk factors using the risk management approach.

2.4 Temporary and emergency changes

The MoC system should also cover any significant temporary or emergency changes that are likely to impact the facility such as:

- the introduction of temporary process equipment which can:
 - increase the risk of a hydrocarbon or other toxic substance release
 - increase the risk of ignition of a hydrocarbon or other toxic substance
 - cause obstruction to explosion vent paths or to escape and evacuation routes
- temporary equipment and structures which obstruct access to critical control or mitigation emergency response equipment
- storage of chemicals which introduce a hazard not expected when developing the design strategies for managing MAE hazards
- emergency changes required to allow ongoing operations during emergency response.

The system should define temporary and emergency changes, how these differ from permanent changes, and define limits on scope and time when such temporary or emergency changes are kept in place. This description should also include the methodology of monitoring these temporary changes and how details are communicated to workers both when they are put in place and when operations return to normal.

2.5 Design change management

During the design and construction phase of a new facility, a process to review and document all changes made to the approved design of the facility should be in place. These changes should be subject to peer review and risk assessment by the design team, the results of which are documented and approved before the changes are made.

Proposed changes to design may be made either internally from members of the design team or externally from the construction contractor or other relevant stakeholder.

A process and related procedures should be in place to document:

- all proposed design changes
- who completed the review and assessment of the proposed change and whether it was approved or rejected
- the updating of relevant documentation or drawings affected by the change.

If the design change is significant or includes complex issues surrounding the type of equipment and components to be used, consider revisiting any risk assessments conducted during the initial design phase to ensure that all identified risks are controlled SFAIRP.

This process should be auditable and include traceability of document and drawing control, archiving of superseded versions and notifications to the design team and, if necessary, the construction contractor and other relevant stakeholders, that changes have been made and updated design documentation is available.

Figure 2 shows an example of how design change should be managed from inception through the verification process to acceptance and management of updates through document control.

Initial design and construction

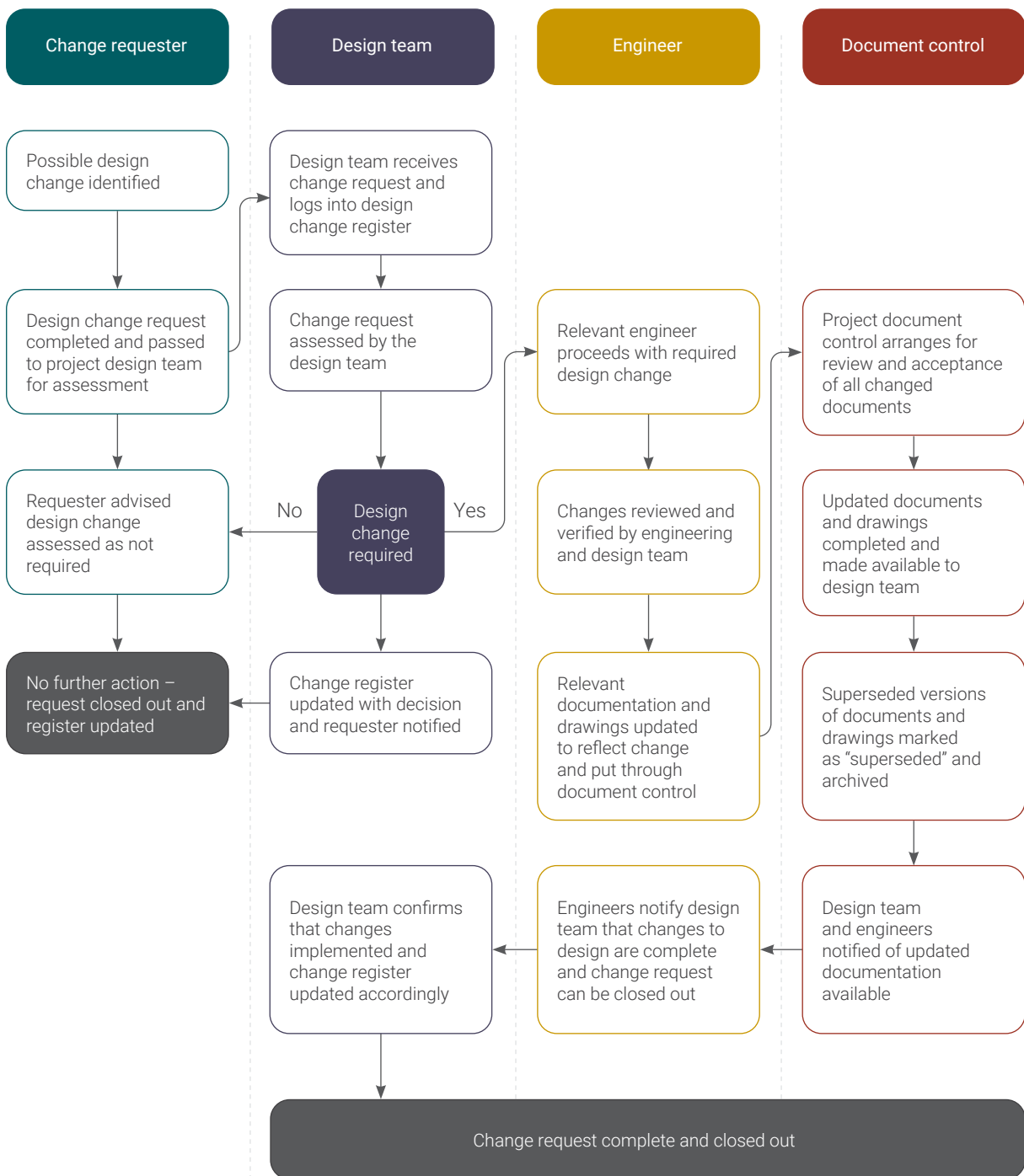


Figure 2 Process flow for design change management

2.6 Change of operating conditions

Changes proposed to the approved design of an operating facility should be reviewed and approved in accordance with the relevant standards covering the proposed changes so that the integrity of the facility is not impaired and the safety of the public and operating workers is not diminished. Further details to operating changes are included in Section 2.6.1.

Changes to operating conditions should include suspension of operations, decommissioning and abandonment, all of which require appropriate plans and documentation to be put in place to manage the change in operational status.

2.6.1 Assessment of proposed operational change

All proposed operational changes to the following areas should be fully assessed by competent engineering, operating and management workers before any changes are made to:

- the design of an operating facility
- operating parameters such as temperature or pressure operating limits, set points and alarms
- equipment or facility components
- procedures or standards.

This assessment should be fully documented. Include relevant hazard identification, risk assessment and control measures associated with the proposed change as well as any possible impact on other areas of the facility, similar facilities within the organisation utilising the same design or components, and the same operating parameters as the area under assessment.

Once the proposed change has been fully assessed a decision can be made as to acceptance or rejection of the change and the necessary communication of the change made to workers (including contractors) and relevant stakeholders. This communication should include:

- the nature of the proposed change
- when it will take place and the details of the team responsible for the implementation of the change
- the estimated completion date of the change and roll out of updated documentation as required
- the schedule for any required training.

Figure 3 provides an indication of the process that needs to be followed to assess and introduce a proposed change to operations.

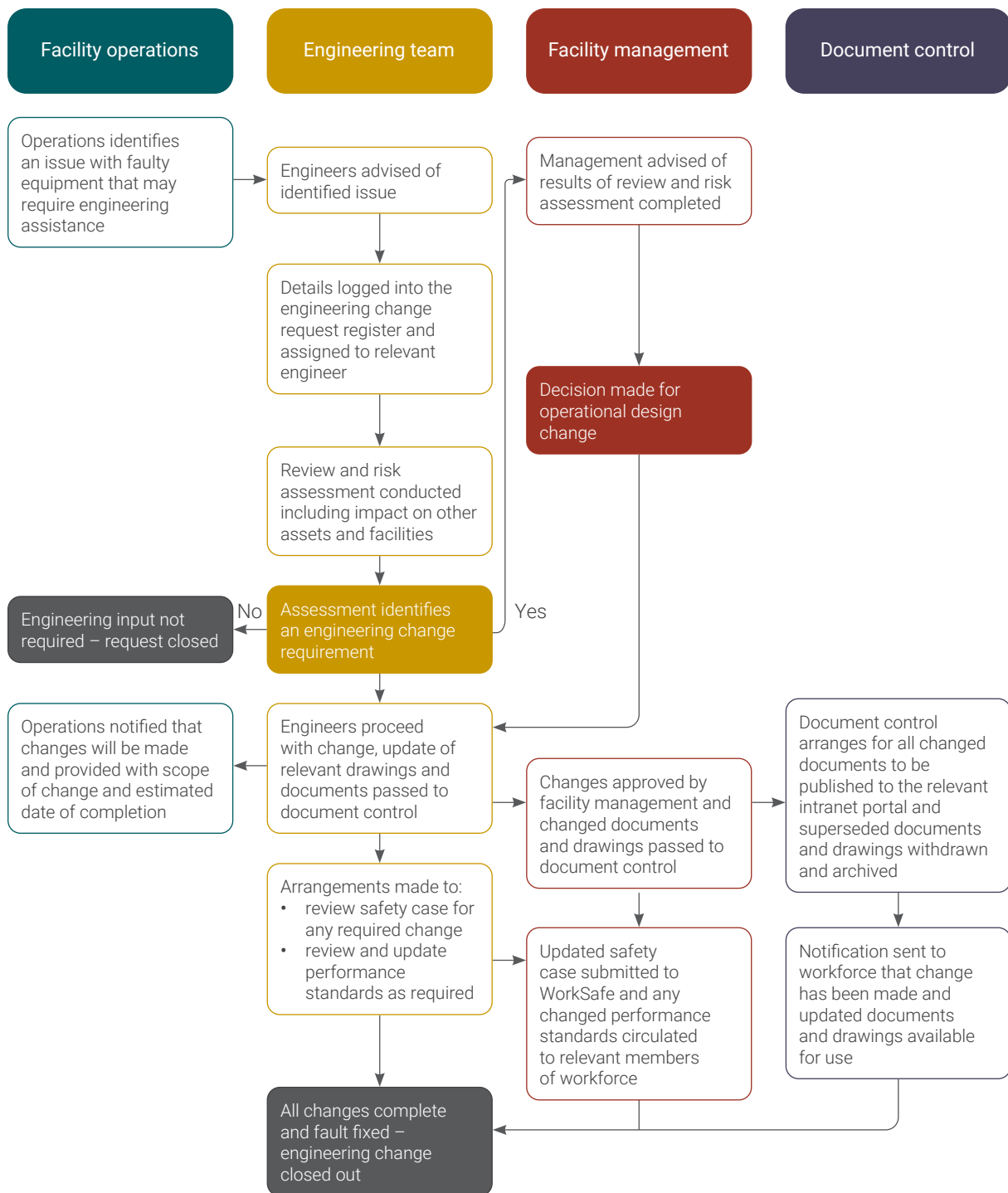


Figure 3 Operational change management

2.6.2 Changes to tools and equipment

Tools are mostly relevant to the safety of a process while it is being undertaken rather than impacting on the longer-term risk. However, some tools that can affect long-term integrity of assets e.g. using a chain sling on coated pipework instead of a web sling.

Generally tools and equipment fall into two categories:

- hand tools and manual equipment – the purchase of these items may be linked to existing codes and standards and as such should not be changed unless approved by management and workers with appropriate levels of expertise and knowledge. Where necessary, if a proposed change is approved, field trials of the new tools may be undertaken to properly evaluate the tools for safety and suitability
- capital equipment – these are usually larger, more expensive items specialised for carrying out unique tasks. The fundamental operation of such an item is usually only changed infrequently and normally requires engineering evaluation before approval by management of the facility for that equipment to be changed.

2.6.3 Changes to procedures and standards

Changes to routine and non-routine procedures should be authorised by the person nominated as the custodian of the document and managed through the organisation's document control process. A non-routine emergency would be the only exemption and approval must be obtained as soon as practicable, or the situation rectified as soon as it is safe to do so.

Changes to the codes and standards covering design or equipment requirements may only be made following assessment of the new standard by suitably qualified workers to ensure it is appropriate for the facility requirements. Once approved for use, a review should be made of controlled documents which may reference the original code or standard so that the reference may be updated to the new standard and with the revised document put through the document control process to register the change.

2.6.4 Alignment of actions with MoC requirements

Operational changes also include the need for management of actions generated from investigations, audits and reviews.

The MoC process should be used where an action has been generated with a requirement to review and possibly change a process system, equipment or procedure.

Depending on the category of the actions generated, completion should be managed under the various requirements for design, operational or documentation changes.

2.7 Worker changes and handover process

Operators must have a process for worker changes during handover at the end of shift and during planned and unplanned leave.

A documented handover should be carried out when workers are:

- changed at the end of shifts
- preparing for a planned work absence
- returning from a work absence
- commencing work in a new position.

Workers should complete detailed handover notes which may be in the form of a diary, notes or a checklist of responsibilities. The handover notes should include any specific details of issues or events that have occurred on the facility, and which may still be ongoing at the time of handover.

Workers replacing absentees on unplanned leave may need to receive written work instructions from the relevant supervisor to assist during the settling in period.

2.8 Organisational change

Change management is not limited to physical changes to facilities. Health and safety implications should be assessed when there are organisational or work activity changes such as:

- change of company ownership
- change of organisational structures and reporting relationships
- change in staffing numbers or staffing philosophy (e.g. downsizing, upsizing or outsourcing)
- job or task redesign
- change in duty allocations.

The MoC process for any of the above organisational changes should be developed and put in place before any of the changes take effect and appropriate change management leaders should be appointed to ensure that consultation and communication takes place with all workers who may be affected by the change. These appointed leaders should also be responsible for the monitoring of the implementation of the change and any adverse effect on the workers or operations of the organisation.

2.9 Introduction of new or changed systems

When an organisation identifies a need to either change an existing system or introduce a new system for the operation of its facilities, consideration must be given to the resources needed to manage this type of change and the possibility of establishing a separate project to manage the implementation of the new system.

Any proposed changes to established systems must be communicated to workers as soon as possible and an opportunity given to key workers who already use an established system or will be expected to use a new system, to be part of the project team.

Early participation of workers will be beneficial to the successful implementation of the new or changed systems.

A change management plan should be established covering:

- the scope of the new or changed systems
- the identification of the project team including workers who will be providing input and coordinating regular communication with workers impacted by the proposed changes
- the time scale for the completion of the changes
- how the new or changed system will be implemented and rolled out
- who will be conducting user acceptance testing (UAT) on the new or changed system
- an overview of the training program to be put in place once the UAT has been completed
- the estimated completion of the rollout of the new system and shutdown of any superseded system.

The new or changed system should then undergo a period of monitoring to ensure that the required results are being achieved from the system and that users have been fully trained and assessed as competent to perform their duties.

Appendix 1 Glossary

The following terms are defined for the purposes of this Guide.

Key terms	Meaning
Competent person	A person who has acquired through training, qualification or experience the knowledge and skills to carry out the task. The definition of 'competent person' in the Work Health and Safety (General) Regulations prescribes specific requirements for some types of work such as diving.
Diving safety management system (DSMS)	A document outlining how the diving contractor will undertake diving projects and the systems in place to manage health and safety of workers, hazard identification and risk management.
Facility	<p>Geothermal energy facility – a place at which geothermal energy operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Petroleum facility – a place at which petroleum operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Mobile facility – includes an onshore drilling rig</p> <p>The term facility has been adopted throughout this document to cover offshore and onshore facilities and pipelines including aboveground structures associated with onshore pipelines.</p>
Inspector	WorkSafe Petroleum Safety inspector
Major accident event (MAE)	An event connected with a facility, including a natural event, having the potential to cause multiple fatalities of persons at or near the facility.
MoC	Management of change
Operator	A person who has, or will have, the day-to-day management and control of operations at a facility and is registered as the operator of the facility under r.22(3).
Person conducting a business or undertaking (PCBU)	A PCBU is an umbrella concept capturing all types of working arrangements or relationships. A PCBU includes a company, unincorporated body or association and sole trader or self-employed person. Individuals who are in a partnership that is conducting a business will individually and collectively be a PCBU. A reference to a PCBU includes reference to the operator of a facility.
Regulator	The WorkSafe Commissioner is the regulator under the <i>Work Health and Safety Act 2020</i>

Key terms	Meaning
Safety case	<p>Documented provisions related to the health and safety of people at or in the vicinity of a facility, including identification of hazards and assessment of risks; control measures to eliminate or manage hazards and risks; monitoring, audit review and continual improvement.</p> <p>In this document a safety case covers all safety management systems, plans and other safety related documents referred to in WHS Act and WHS PAGEO regulations</p>
SFAIRP	So far as is reasonably practicable
SMS	Safety management system
UAT	User acceptance testing
WHS Act	<i>Work Health and Safety Act 2020</i>
WHS PAGEO Regulations	Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022
Worker	Any person who carries out work for a person conducting a business or undertaking, including work as an employee, contractor or subcontractor (or their employee), self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' or a volunteer

Appendix 2 Further information

Petroleum safety guidance

Interpretive guidelines

- *Development and submission of a diving safety management system*
- *Development and submission of a safety case*
- *Development and submission of an onshore facility safety case – drilling operations*

Guides

- *Audits, review and continual improvement*
- *Bridging documents and simultaneous operations (SIMOPS)*
- *Dangerous goods and hazardous chemicals in petroleum, pipeline and geothermal energy operations*
- *Decommissioning and management of ageing assets*
- *Demonstration of risk reduction so far as is reasonably practicable (SFAIRP)*
- *Diving start-up notices*
- *Emergency response planning*
- *Facility design case*
- *Hazard identification*
- *Health and safety leading and lagging performance indicators*
- *Human factors fundamentals for petroleum and major hazard facility operators*
- *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operations*
- *Identification of major accident events, control measures and performance standards*
- *Inspections – Land-based drilling rigs*
- *Involvement of workers*
- *Management of change*
- *Nomination of an operator*
- *Records management including document control*
- *Risk assessment and management including operational risk assessment*
- *Validation requirements*

Australian and international standards

- ISO 17776 *Petroleum and natural gas industries – Offshore production installations – Major accident hazard management during design of new installations*
- AS/NZS 2885.1 *Pipelines – Gas and liquid petroleum – Part 1: Design and construction*
- AS/NZS 2885.3 *Pipelines – Gas and liquid petroleum – Part 3: Operation and management*
- AS/NZS 2885.4 *Pipelines – Gas and liquid petroleum – Part 4: Submarine pipeline systems*
- AS/NZS 2885.6 *Pipelines – Gas and liquid petroleum – Part 6. Pipeline safety management*
- AS/ANZ ISO 9001 *Quality management systems – Requirements*
- AS ISO 10007 *Quality management – Guidelines for configuration management*
- AS/NZS ISO 45001 *Occupational health and safety management systems – Requirements with guidance for use*

Codes of practice

- [*Mentally healthy workplaces for fly-in fly-out workers in the construction and resources sector*](#)
- [*Psychosocial hazards in the workplace*](#)
- [*Violence and aggression at work*](#)
- [*Workplace behaviour*](#)

See the WorkSafe website for [approved codes of practice](#) on a range of related topics such as *Managing the risks of hazardous chemicals in the workplace*, *Confined spaces*, *Managing the risk of falls at workplaces*, *Managing risk of plant* and *Managing the work environment and facilities*.

Other resources

WorkSafe WA

- [Overview of Western Australia's Work Health and Safety Act 2020: Guide](#)
- [Discriminatory, coercive and misleading conduct: Interpretive guideline](#)
- [How to determine what is reasonably practicable to meet a health and safety duty: Interpretive guideline](#)
- [Incident notification: Interpretive guideline](#)
- [The health and safety duty of an officer: Interpretive guideline](#)
- [The meaning of 'person conducting a business or undertaking' \(PCBU\): Interpretive guideline](#)



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