Integrated Management System

Contractor Management Guidance Document

Confined Space Entry

Document Reference:	**IMS-08.01.05-CMG-06**
Revision Number:	**1**
Date Issued:	**January 2026**
Issued By:	**Peter Lund**
Approved By:	**Andrew Edwards**

CONTENTS

1. INTRODUCTION

Contractor Guidance Documents (CGD) are designed ensure that Contractors, Subcontractors and Service Providers working at the Company's Petrol Filling Stations are aware of the hazards associated to working at these locations and the Company's basic requirements for specific types of work that have been identified as involving significant risk (**Major Work**).

The Company requires Contractors, Subcontractors and Service Providers to ensure that the Safe Methods of Working and Risk Assessment and Method Statements (RAMS) produced for an assigned scope of work include relevant aspects from the guidance provided to ensure that:

- Work site and task specific risks are identified risks
- Suitable and sufficient risk reduction measures (i.e., controls) are identified and detailed in the work control documents; and
- Assigned work activities are:
    - Effectively described; and
    - Performed safely

Note 1.1: For the purpose of this Contractor Guidance Document, Contractors, Subcontractors and Service Providers will be referred to collectively as **Contractors**.

Contractor Guidance Documents are considered a useful guide to Contractors regarding Company expectations for the safe performance of work, as they take account of the potential hazards present at a Petrol Filling Station and set minimum standards for the performance of work tasks that the Company is not sufficiently knowledgeable of, or experienced in, to allow the development of suitable and sufficient Risk Assessment and Method Statements (RAMS).

The responsibility for ensuring work tasks are performed safely remains with the Contractor who must ensure that working practices are critically assessed, with due consideration given to the information provided in the Contractor Guidance Documents.

Note 1.2: Contractor Guidance Documents **DO NOT** override or relieve Contractors of their statutory obligations under applicable legislation.

2. PURPOSE

This Contractor Guidance Document details MFG's minimum expectations regarding the entry into a classified confined space at Company Petrol Filling Stations, to ensure that Contractors are aware of the expectation place on them both by the Client (i.e., MFG) and applicable legal obligations and are able to safely perform assigned work tasks.

Note 2.1: If clarification or further understanding of the content of this Contractor Guidance Document is required, Contractors must contact the HSE Manager (MFG) via HSE_Team@Motorfuelgroup.com.

3. GENERAL GUIDANCE

3.1 INTENT

The document is designed to provide guidance to Contractors who are awarded contracts to perform confined space entry work at a Company Service Station. This guidance document specifically details expectations regarding confined space evaluation and preparation, entry control and authorisation, and safe performance of **Confined Space Entry.**

3.2 WORK CONTROL

Work tasks assigned to Contractors will be assessed to identify potential hazards and the associated risk. Work identified as involving significant risk will be categorised as **Major Works**, requiring a **Work Control Permit** (**WCP**) to be prepared, authorised and issued prior to confined space entry occurring.

3.3 Definition of Confined Space

Confined Space is an enclosed or partially enclosed space, not designed or intended for continuous human occupancy that has a restricted, limited or impeded means of entry or exit and may become hazardous to personnel entering it because of its design, construction, location or materials or substances in it, or a condition or changing set of circumstances within the space that presents a potential for harm and/or an atmosphere that is or may be injurious by reasons of oxygen deficiency or enrichment, flammability, explosiveness, or toxicity.

Examples of the types of confined spaces include, but may not be limited to:

- Underground Storage Tanks
- Above Ground Storage Tanks
- Oil / Water Separators
- Excavations and Trenches, at a depth of five (5) feet (1.5m), or greater
- Manholes; and
- Drainage Pits and Sewers

3.4 Controls for Confined Space Entry

Entry into a confined space will be controlled by the issue of the following documents:

- Contractors' Risk Assessment and Method Statement (RAMS)
- Work Control Permit specifying the controls related to the work activities taking place within the confined space, for example:
    - Storage Tank:
        - Cleaning
        - Inspection
        - Lining
    - Excavation or Trench
        - Pipe laying
        - Cable laying
- Rescue Plan, as applicable to the scope of work; and
- Clearance Certificate

Note 3.4.1: Contractors will ensure that RAMS produced for a defined scope of work are suitable and sufficient and meet their legal obligations. A designated MFG Representative will ensure that RAMS adequately detail the work, and that site specific hazards that may impact the work, are considered.

3.5 Confined Space Entry Qualifications

Contractors will provide trained and competent personnel to perform confined space entry activities. Where required by applicable legal obligations and/or industry codes and standards, those performing confined space entry will hold the required qualifications for the work being performed.

Note 3.5.1: In situations where a worker is properly trained but may not have the required experience to perform their assigned duties without supervision, the Contractor will ensure that the worker is teamed up with, and work under the direct supervision of, a Competent Person.

3.6 Confined Space Entry Responsibilities

3.6.1 Designated MFG Representative (Permit Issuer)

A designated MFG Representative will be assigned responsibility for the safe and proper preparation, authorisation and issue of the Work Control Permit, other duties will include but may not be limited to:

- Reviewing the Contractors' RAMS, to:
  - Determine their suitability for the proposed work; and
  - Acknowledge that they meet Company expectations
- Conducting a work site inspection with the Contractor (Entry Supervisor) to:
  - Identify work site and job specific hazards and risks
  - Determine any additional risk reduction measures (i.e., controls) necessary; and
  - Confirm mutual understanding of the work scope, hazards, associated foreseeable risks, and relevant risk reduction measures (i.e., controls)
- Preparing, authorising, and issuing a Work Control Permit for the defined scope of work
- Confirming:
  - Those performing confined space entry are trained and competent to do so
  - The identified risk reduction measures (i.e., controls) have been effectively implemented
  - Work site conditions are acceptable, and will allow the proposed work to proceed safely
  - Other tasks that may impact safe confined space entry are referenced on the Work Control Permit
  - Any required signage (e.g., Do Not Enter), and/or barriers are installed
  - An Authorised Person has completed and recorded all required gas testing, and confirmed the test result are acceptable for confined entry to proceed, and
  - A Rescue Plan has been developed and communicated to affected personnel
- Ensuring that the Entry Supervisor:
  - Understands their responsibilities regarding revalidating the Work Control Permit
  - Signs the Work Control Permit **Authorisation & Declaration Section**; and
  - Accurately completes a **Clearance Certificate** for the defined scope of work

3.6.2 ENTRY SUPERVISOR

The Entry Supervisor will:

- Understand their responsibilities for work involving confined space entry, as detailed in the:
  - RAMS
  - Work Control Permit
  - Clearance Certificate; and
  - Any other associated documentation
- Confirm:
  - The work scope, the equipment to be used, the associated hazards, the proposed risk control measures, and the identified safe method of working (i.e., RAMS)
  - The Entry Attendant and Authorised Entrants are aware of their roles and responsibilities and are trained and competent to perform tasks assigned to them
  - Equipment (including PPE) provided for the safe performance of the work is maintained, certified (as applicable), and remains fit for purpose throughout the entry work
  - The work site and confined space are adequately prepared for the work:
    - Any required energy isolations have been installed and verified as effective
    - Cleaning and ventilation requirements have been effectively met; and
    - Gas testing has been performed, and result are acceptable for entry to proceed
  - A Rescue Plan has been developed and communicated to affected personnel, if applicable
  - Rescue personnel are trained and competent

- Hold a pre-job safety meeting with relevant personnel (e.g., Job Crew and any other affected personnel) to:
  - Explain the content of the RAMS, Work Control Permit and Clearance Certificate
  - Ensure the Job Crew understand the:
    - Duties assigned
    - Work to be performed within the confined space
    - Risk reduction measures (i.e., controls); and
    - Action to be taken if an incident occurs in a confined space
- Ensure that:
  - Entry work is coordinated with other activities
  - A list of persons entering and exiting the confined space is maintained
  - Personnel are accounted for when the entry work is completed or suspended
- Periodically monitor the status of the work being performed
- Effectively monitor and maintain the identified risk reduction measures (i.e., controls); and
  - At the end of the working day prior to ensure site housekeeping standards are acceptable and that the confined space is secured against unauthorised entry; and
  - Prior to closing the Work Control Permit after ensuring that
    - Housekeeping standards are acceptable
    - Equipment, tools and debris (i.e., waste) have been removed; and
    - The confined space is secured against unauthorised entry

3.6.3 AUTHORISED ENTRANTS

Authorised Entrant will:

- Be trained and competent to perform entry into a confined space
- Understand their responsibilities and duties during confined space entry work
- Be aware of the following:
  - Hazards and associated risks of confined entry and work within the confined space
  - Risk reduction measures (i.e., controls) to be implemented and maintained
- Verify that any required hazardous energy isolations (i.e., LOTO), are in place
- Comply with the conditions detailed in the:
  - RAMS
  - Work Control Permit; and
  - Clearance Certificate, for entry and the work within the confined space
- Confirm:
  - PPE and respiratory protection are used correctly and maintained fit for purpose
  - The tools and equipment to be used are maintained fit for purpose
  - Communication requirements with the Entry Attendant
- Attend the pre-job safety brief with the Entry Supervisor, and confirm mutual understanding of the proposed work and associated control measures
- Report unsafe acts or unsafe conditions to the Entry Supervisor
- Exit the confined space:
  - If instructed to do so
  - If symptoms of exposure to hazardous materials are recognized
  - If conditions within the confined space change, that may impact personal safety

- Upon malfunction of respiratory protection equipment
- If increased breathing resistance of the respirator is noted
- If severe discomfort, including ill health, is detected
- To change filer/cartridge elements or replace respiratory protection equipment as per manufacturer's instructions

3.6.4 Entry Attendant (Safety Watch)

The Entry Attendant will:

- Be positioned at the entrance to the confined space
- Continuously monitor those working within the confined space
- Understand their responsibilities and duties during confined space entry
- Be aware of the following:
  - Hazards and associated risks of the entry work; and
  - Risk control measures to be implemented
- Verify that:
  - Any required energy isolations (LOTO), are in place; and
  - The identified control measures are implemented prior to entry and effectively maintained throughout the work
- Comply with the conditions detailed in the:
  - RAMS
  - Work Control Permit; and
  - Clearance Certificate, for entry and the work within the confined space
- Be aware of equipment shutdown requirements in the event of an emergency
- Verify that gas testing results are, and remain, within tolerance for entry

  Note 3.6.1: Where required, the Entry Attendant will record gas test readings in accordance with instructions issued by the Authorised Person (e.g., Work Control Permit or other report form).
- Only allow authorised personnel to enter the confined space
- Maintain regular communications with the entrants
- Use the identified safety equipment correctly:
- Alert entrants to unsafe situations and instruct them to exit the space when required
- Raise the alarm if an emergency occurs within the confined space and request support as needed
- Be familiar with the Rescue Plan, know who is providing rescue services, and ensure that the identified rescue equipment is maintained ready for use, close to the confined space

  Note 5.4.2: The Entry Attendant is not permitted to enter a confined space to attempt a rescue on their own, they must wait for support to arrive and/then only attempt the rescue if trained and competent to do so.

3.6.5 Authorised Person (Gas Testing)

The Contractor will assign a trained and competent person Authorised Person responsibilities for the safe and proper performance of gas testing activities (where required) and accurate reporting of hazardous vapours.

4. General Guidance for Confined Space

4.1 Hazard Assessment

Prior to the issue of a for work involving confined space entry the designated MFG Representative and Entry Supervisor will perform a hazard assessment that is appropriate to the proposed scope of work,

the space to be entered and the work site. The objective of the assessment will be to determine the potential hazards and the associated risk control measures needed to reduce risks to an acceptable level.

The assessment will include the identification of any required energy isolations, and the containment, dissipation and removal of explosive, flammable, combustible materials and/or toxic liquids or vapors from the confined space and work site. The hazard associated with confined space entry may include, but are not limited to:

- Accumulation of chemicals or fumes
- High levels of noise or heat (heat stress)
- Improper isolation of energy or chemical sources
- Moving parts, obstructions, or voids within the confined space
- Oxygen depletion or enrichment
- Presence of explosive, flammable or toxic liquids and vapours (e.g., benzene, H_2S, CO, etc.)
- Poor lighting or access and egress; and
- Unstable physical containment or surroundings (e.g., trenches and excavations)

The designated MFG Representative and Entry Supervisor will:

- Discuss the identified hazards, the required risk reduction measures (i.e., controls), and any other relevant information to ensure mutual understanding
- Agree the actions necessary to perform confined space entry and associated work safely; and
- Ensure that the requirements for safe entry are documented in the RAMS, Work Control Permit and Clearance Certificate, prior to entry taking place.

Note 6.1.2: If changes with the potential to cause harm to personnel, the environment, or assets, occur at any time following issue of the Work Control Permit the Permit and Clearance Certificate will be suspended. Work will not recommence until approval from the designated MFG Representative is obtained.

4.2 Work Site (Including Entry) Preparations

The designated MFG Representative and Entry Supervisor will confirm:

- The confined space and work site have been adequately prepared for the proposed work

  Note: 4.2.1: Preparation will be appropriate to the nature of the confined space to be entered and scope of work to be performed during entry.
- All pre-entry preparation activities have been completed, and the specified risk reduction measures (i.e., controls) have been verified as effective (e.g., tested), prior to authorising the Work Control Permit

4.3 Work Control Permit Issue

The designated MFG Representative and Entry Supervisor will review the RAMS, Work Control Permit, Clearance Certificate and Rescue Plan (where applicable) developed for the confined space entry and confirm the work control documents are complete in all aspects and there is mutual understanding of the content.

Note 4.3.1: Both will sign the Authorisation and Declaration Section of the Work Control Permit and the Clearance Certificate prior to their issue.

The Entry Supervisor will ensure that copies of the RAMS, Work Control Permit and Clearance Certificate and other relevant documentation are retained at the work site and are available to the Job Crew and other affected personnel for reference purposes.

4.4 Pre-Job Safety Brief

Following issue of the Work Control Permit, Clearance Certificate, and other relevant documents the Entry Supervisor will hold a pre-job safety brief with the Job Crew and other affected personnel. At the meeting the Entry Supervisor will discuss the content of the:

- RAMS
- Work Control Permit
- Clearance Certificate; and
- Other relevant documents; to ensure mutual understanding

4.5 Conditions For Entry into a Confined Space

4.5.1 When Does Entry Occur

Confined space entry is considered to have occurred when an individual's breathing zone is in, or immediately adjacent to, the opening to the confined space. The entire body does not have to be inside the space for entry to have occurred.

Note 4.5.1: Openings in vessels and equipment too small for entry are not considered confined spaces, but precautions must be taken to protect personnel from hazardous atmospheres near such openings.

4.5.2 Cleaning, Purging and Ventilation

Exposure to hazards within a confined space will be controlled by cleaning, purging, or venting the space prior to entry wherever possible. Methods for preparing a confined space for entry include, but are not limited to:

- Draining or pumping out
- Hot or cold-water flushing
- Forced or natural ventilation; and
- Inert gas purge

Contractors will ensure Safe Method of Working or RAMS are:

- Developed for pre-entry cleaning, purging or ventilation of a confined space; and
- Submitted to MFG for review and acknowledgement prior to preparation work commencing

Note 4.5.2.1: If required a Work Control Permit and Clearance Certificate will be prepared, reviewed, approved, and issued to control these activities.

Note 4.5.2.2: Where this is not possible to adequately clean, purge, or vent a confined space prior to entry, alternative arrangements, including use of respiratory protection, will be considered, the hazards assessed, and suitable risk control measures implemented.

4.5.3 Energy Isolations (LOTO)

The Entry Supervisor will ensure that any sources of hazardous energy (e.g., electrical, chemical, mechanical, hydraulic, etc.) with the potential to impact the confined space entry are physically isolated.

Physical isolation includes but may not be limited to:

- Electrical isolation (e.g., removal of a fuse or shutdown of energy supply box)
- Physical disconnection of pipelines or electrical components
- Closure, and locking in the closed position, of valves; and
- Installing blinds between valves or components

4.5.4 Atmospheric Monitoring (Gas Testing)

Atmospheric gas testing for oxygen, flammable and toxic vapors will be carried out prior to confined space entry taking place by Authorised Person who will:

- Perform the range of gas tests necessary to confirm that the atmosphere at the work site and within the confined space is acceptable for safe entry
- Consider the need for continuous (gas) monitoring during confined space entry
- Accurately record the gas test results on the Work Control Permit or designate report form
- Confirm that the gas test results are acceptable for confined space entry

Note 4.5.4.1: Continuous (gas), monitoring will be required if there is a potential for a change in atmospheric conditions during entry and/or when hot work is being performed within the confined space.

The following parameters are to be used as minimum standards:

- Confined space entry is not permitted, even wearing suitable respiratory protection, if:
  - Lower Explosive Limit (LEL) readings exceed 10% of LEL
  - Oxygen level is greater than 23.0%
- Confined space entry is not permitted without respiratory protection if:
  - Oxygen level is <19.5%; and
  - Toxic vapor is identified greater than the Worker Exposure Limit (WEL), for example:
    - Hydrogen Sulfide (H_2S): ≥10 ppm
    - Benzene: ≥1 ppm; and
    - Carbon Monoxide: ≥30 ppm
- If hot work is required within a confined space a LEL reading of <5% LEL is required prior to starting the work

4.5.5 Respiratory Protection

Where identified as a hazard control measure, respiratory protection will be worn by the Job Crew during hot work within the confined space. The use, inspection, maintenance, and testing of respiratory protection equipment will be in accordance with the RAMS developed for the work and legal obligations.

4.5.6 Rescue Plan

Contractors will determine specific requirements for rescue that will be defined within a Rescue Plan, Safe Method of Working, and/or RAMS. At a minimum, the plan will address:

- The personnel required to perform a rescue
- The equipment to be used
- The method(s) of communication
- How the rescue will be affected; and
- Access and Egress Routes

Those assigned responsibilities for rescue must be:

- Trained and competent in confined space entry and rescue
- Properly equipped and capable of safely completing their duties (including First Aid if applicable)
- Informed of potential hazards, trained in hazard recognition in relation to those hazards they may encounter and aware of the relevant hazard control measures to be used

Note 4.5.6.1: If trained as a rescuer the Entry Attendant may enter a confined space to affect a rescue, only if another qualified standby person with suitable PPE and/or respiratory protection is positioned at the entrance to the confined space prior to the Entry Attendant entering the space.

4.6 Other Considerations

4.6.1 Compressed Gas Cylinders

Compressed gas cylinders are not permitted inside a confined space, except:

- A cylinder of compressed air supplied to a respirator
- Medical resuscitation equipment
- Handheld aerosol spray containers
- Fire extinguishers; or
- Other equipment permitted by relevant regulatory agency

4.6.2 Welding and/or Burning Equipment

Torches and hoses used for welding, brazing, or cutting must be removed from a confined space when not in use and/or when the confined space is vacated.

4.6.3 Electrical Equipment

Electrical tools and equipment must be grounded or double-insulated. If wet or damp conditions exist inside the space, electrical equipment must be protected by an approved ground fault circuit interrupter.

Only non-sparking tools may be used in a confined space where flammable or explosive gases, vapors or liquids are present.

Note 4.6.3.1: Activities involving the use of high-pressure steam or air hoses, inert gases or sand blasting equipment have the potential to generate static electricity. Adequate precautions (e.g., grounding), will be implemented when such equipment is used during entry work.

4.6.4 Heaters

Heaters must be located outside the confined space and hoses secured to prevent tripping hazards within the confined space. Direct-fired heaters that discharge exhaust gases with the heated air are not permitted for use in confined spaces.

Note 4.6.4.1: Gas testing for Carbon Monoxide (CO) will be performed if motorised (petrol or diesel driven) is used in close proximity to a confined space, or when heated air is introduced into a confined space.