



Integrated Management System

Contractor Management Guidance Document

Confined Space Entry (Excavations)

Document Reference: **IMS-08.01.5-CMG-22**

Revision Number: **1**

Date Issued: **January 2026**

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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 **Confined Space Entry (Excavations)** 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 for a specific work scope at a Company Service Station, that includes a requirement to perform work activities within excavations and trenches that may include confined space entry which has been identified as potentially involving significant risk (**Major Works**). This guidance document details expectations for **Confined Space Entry (Excavations)**.

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.

Contractors will conduct a work site inspection to identify the risks associated to the proposed work tasks and determine the risk reduction measures (i.e., controls) required to reduce risk to an acceptable level.

3.3 RISK ASSESSMENT & METHOD STATEMENT

Contractors will carry out a hazard inspection of the work site and determine the risk reduction measures (i.e., controls) required when confined space entry is required following breaking ground activities (i.e., excavation and trenching). Consideration will be given to:

- The scope of work and associated tasks, for example:
 - Protection methods and/or devices (e.g. shoring, benching, trench box, etc.)
 - Safe means of access and egress
 - Removal of excess water from the excavation (i.e., pumped to drainage system)
 - Prevention of dropped objects; and
 - Access and operational restrictions on excavator use
- Identification of any required hazardous energy isolations
- Containment, dissipation and removal of explosive, flammable, combustible materials and/or toxic liquids or vapours from the confined space (i.e., excavation)
- Identification of action necessary to address risks associated to the following hazards:
 - Accumulation of chemicals or fumes
 - High levels of noise
 - Improper isolation of sources of hazardous energy
 - Moving parts, obstructions, or voids within the excavation or trench
 - Oxygen depletion or enrichment
 - Presence of:
 - Explosive, flammable, or toxic gases
 - Flammable or toxic liquids (e.g., **H₂S**); and
 - Asbestos waste
 - Poor lighting or access and egress
 - Unstable physical containment or surroundings
- Mechanical plant to be used, for example:
 - 360 Excavator
 - Concrete delivery vehicle; and
 - Dumper truck
- Mechanical equipment to be used, for example
 - Compactor (e.g., Whacker Plate)
 - Handheld Breaker; and
 - Stihl Saw
- Non mechanical hand tools, including access ladders
- Location of the work activity (i.e., workplace hazards)
 - Traffic movement
 - Flammable liquids and vapours
 - Infrastructure (i.e., dispensers, valeting, LPG, retail building and Fo to Go)
 - Activities of other (i.e., customers, visitors, etc.); and
 - Overhead hazards (i.e., powerlines)

Note 3.3.1: The presence of overhead electrical cables presents a risk of electrocution, for 230 kV cables the recommended minimum safe working distance is four (4) metres (13.1 feet) and for 50kV cable the minimum safe working distance is three (3) metres (9.8 feet).

- Duration of the work
- Confined space entry consideration (e.g., access, egress, fall from height protection, etc.)
- Condition and stability of existing structures and surfaces, including ground conditions
- Physical capabilities of the workers; and
- Emergency procedures required in the event of an incident

Contractors will formally record the assessment findings as part of the task-specific Risk Assessment and Method Statement, which will include as a minimum:

- Hazards
- Associated risks to people, the environment and assets
- Risk ranking for existing risks (e.g., High, Medium or Low)
- The risk reduction measures (i.e., controls) required to reduce the existing risks
- A residual risk ranking following implementation of controls (e.g., High, Medium or Low); and
- Step by step description of how work tasks will be performed safely

Note 3.3.2: If residual risk is determined after implementation of additional risk reduction measures (i.e., controls) to remain **High Risk**, work cannot begin. Further assessment is required to identify other controls that, following implementation, will residual reduce to an acceptable level.

4. CONFINED SPACE DEFINITION

A confined space is defined as:

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 that may be present or create at a MFG Service Station includes but may not be limited to:

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

Note: 4.1.2: If workers are required to crouch or knee within an excavation to perform their assigned tasks the height at which the excavation is considered a confined space will be reduced to three (3) feet (0.91m).

5. CONFINED SPACE ENTRY QUALIFICATIONS & RESPONSIBILITIES

5.1 ENTRY QUALIFICATIONS:

Personnel required to enter a **permit required** Confined Space (Excavation) will be:

- Trained and experienced in work involving entry into a confined space (i.e., excavation)
- Aware of the required risk reduction measures (i.e., shoring / trench box, etc.)
- Properly equipped, (e.g., PPE and Respiratory Protection (when required))

- Capable of performing assigned duties safely, including medical suitability where applicable; and
- Able to use the required safety equipment in a safe and proper manner

Note 5.1.1: Where an individual is trained but may not have the required experience to work in confined spaces, the individual must be teamed up with, and work under the direct supervision of, a Competent Person.

5.2 RESPONSIBILITIES: ENTRY SUPERVISOR (PERMIT HOLDER)

The Contractor (i.e., Entry Supervisor) will:

- Understand their responsibilities for work involving confined space entry into an excavation, as detailed in the:
 - Risk Assessment and Method Statement (RAMS)
 - Work Control Permit (WCP); and
 - Clearance Certificate
- Confirm:
 - Work scope
 - Equipment to be used
 - Potential hazards (e.g., job specific and work site specific)
 - Proposed risk reduction measures
 - Risk Assessment and Method Statement (RAMS)
 - Authorised Entrants are:
 - Trained and competent to perform their assigned tasks; and
 - Aware of their roles and responsibilities within the confined space
 - Equipment (including PPE) provided for the work:
 - Is certified, as required by applicable legislation
 - Visually inspected prior to starting work
 - Properly maintained; and
 - Remains fit for purpose throughout the entry work
 - The job site is adequately prepared for the work, for example:
 - Any required energy isolations installed and verified as effective
 - Protection methods used, or devices installed, to prevent cave-in
 - Slip, trip, and fall hazards eliminated from the work area
 - Safe means of access and egress provided
 - Excess water pumped from the excavation; and
 - Gas testing of the work site and excavation performed to confirm safe to enter; and
 - A Rescue Plan has been developed and communicated to affected personnel, if applicable
- Hold a pre-job safety meeting with Job Crew and other affected personnel at which the content of various work control documents is explained to ensure mutual understanding:
 - Risk Assessment & Method Statement (RAMS)
 - Work Control Permit (WCP); and
 - Clearance Certificate
- Entry work is coordinated with other activities
- Periodically monitor the status of the work being performed; and
- Maintain:
 - A list of persons entering and exiting the confined space (excavation); and

- Maintain the identified control measures

5.3 RESPONSIBILITIES: AUTHORISED ENTRANTS

The Contractor (Authorised Entrants) will:

- Understand their responsibilities and duties during confined space entry work
- Be aware of the:
 - Hazards and associated risks of the entry work; and
 - Risk reduction measures required to reduce risk to an acceptable level
- Verify that any required energy isolations (LOTO), are in place
- Comply with the conditions detailed in the:
 - Risk Assessment & Method Statement
 - Work Control Permit (WCP)
 - Clearance Certificate
- Confirm:
 - PPE and respiratory protection (i.e., dust masks or suitable respirators) is used correctly and maintained fit for purpose
 - Tools and equipment are visually inspected prior to use and maintained fit for purpose; and
 - Communication requirements with the Entry Attendant
- Report unsafe acts or unsafe conditions to the Entry Supervisor
- Exit the confined space if:
 - Instructed to do so
 - Conditions that may impact personal safety, change within the confined space change
 - Symptoms of exposure to hazardous materials are recognised; and
 - Severe discomfort, including ill health, is detected

5.4 RESPONSIBILITIES: ENTRY ATTENDANT (SAFETY WATCH)

The Contractor (i.e., Entry Attendant) will:

- Be positioned outside the confined space (i.e., excavation)
 - Continuously monitor those working within the excavation
 - Understand their responsibilities and duties
 - Be aware of the:
 - Hazards and associated risks of the entry work; and
 - Risk reduction measures required to reduce risk to an acceptable level
 - Verify:
 - Required energy isolations (LOTO), are in place; and
 - Identified control measures implemented prior to entry and maintained throughout the work
 - Comply with the conditions detailed in the RAMS, PTW 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 5.4.1:** Where required, the Entry Attendant will record gas test readings in accordance with instructions issued by the Authorised Person.
- 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; and
- Be familiar with the Rescue Plan:
 - Know who is providing rescue services; and
 - Ensure rescue equipment is maintained ready for use, close to the confined space

Note 5.4.2: 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 to do so.

5.5 RESPONSIBILITIES: AUTHORISED PERSON (GAS TESTER)

Contractors will assign a trained and competent person **Authorised Person** responsibilities for atmospheric monitoring (i.e., gas testing) and period gas monitoring activities. Atmospheric monitoring is required prior to any entry into a confined space as part of the risk reductions measures detailed in the Safe Method of Working or Risk Assessment & Method Statement, and Work Control Permit.

Note 5.5.1: Contractor guidance regarding Atmospheric Monitoring (Gas Testing) is defined in Contractor Guidance Document: Atmospheric Monitoring (Gas Testing) ([IMS-08.04.7](#)).

6. PREPARING FOR CONFINED SPACE ENTRY (EXCAVATION)

The Contractor (i.e., Entry Supervisor) will:

- Confirm:
 - Excavation is safe in all aspect for entry, for example:
 - The removal of:
 - Slip, trip, and fall hazards
 - Waste materials; and
 - Excessive levels of water
 - The provision of suitable and safe means of access and egress; and
 - Availability of suitable risk reduction measure designed to prevent wall collapse
- Note 4.1:** Excavations deeper than 1.52 metres (5 feet) are considered a confined space and require the issue of a Work Control Permit (WCP) allow entry into the excavation. Additionally, if workers are required to in a crouched or kneeling position to perform work within an excavation, a Work Control Permit (WCP) will be required at a reduced depth.
- Availability of:
 - Sufficient:
 - Materials for work within the confined space; and
 - Worker resource, to safely complete the assigned work
 - The tools and equipment necessary to safely and efficient perform the assigned work
 - Review the Risk Assessment and Method Statement (RAMS) for the work, to:
 - Ensure full understanding
 - Confirm suitable for the proposed work; and/or
 - Identify and record any required amendments to the RAMS
 - Review the Work Control Permit (WCP) if required, with the designated MFG Representative
 - Prepare a Clearance Certificate
 - Communicate the content of the Work Control Permit and Clearance Certificate to the Job Crew and other affected personnel (i.e., Pre-Job Safety Brief) and confirm mutual understanding of:
 - Risk Assessment and Method Statement (RAMS)

- Work Control Permit; and
- Clearance Certificate
- Assign duties to each member of the Job Crew and confirm their responsibilities
- Verify that:
 - Risk reduction measures (i.e. controls) for confined space entry, are implemented
 - Mobile plant and equipment being used is properly inspected, certified as fit for purpose, and is available for use; and
 - Atmospheric monitoring (i.e., gas testing) of the confined space (i.e., excavation) and general work area has been performed by an Authorised Person and the reading confirmed as within acceptable tolerances:
 - Oxygen: **19.5% to 23.0%**
 - Flammable Vapour: Less Than 5% LEL (**<5% LEL**)
 - Hydrogen Sulphide: Less Than 10 ppm (**<10 ppm H2S**)
 - Carbon Monoxide: Less Than 30 ppm (**<30 ppm CO**); and
 - Other identified vapours of concern: Within Published Worker Exposure Limits (WEL's)
- Ensure that:
 - Equipment to be used during entry into the excavation or trench (i.e., confined space) is inspected and confirmed fit for purpose, for example:
 - Motorised Plant (e.g., 360 excavator, concrete delivery vehicle, dumper truck, etc.)
 - Concrete forming frames
 - Mechanical hand tools; and
 - Non-mechanical hand tools
 - Plant and equipment operators are trained and competent to perform their assigned duties
 - The work site is safe in all aspect to allow confined entry to proceed
 - Rescue equipment, as specified in the Rescue Plan, is available at the work site; and
 - The Job Crew are ready in all aspects to proceed with the work

7. CONFINED SPACE ENTRY (EXCAVATION)

The Contractor (i.e., Authorised Entrants and Entry Attendant) will:

- Confirm the excavation is ready in all aspect for entry, for example:
 - Excavation has been completed
 - Suitable risk reduction measures (i.e., controls) are established to prevent wall collapse:
 - Shoring
 - Benching; and
 - Trench Box
 - Breaking ground activities have been suspended or completed
 - Any pre-entry construction work has been completed
 - Safe means of access and egress provided
 - Gas testing of the work site and confined space has been performed, with tests for:
 - Oxygen
 - Flammable Vapour
 - Hydrogen Sulphide
 - Carbon Monoxide; and
 - Other Identified Vapours of Concern; completed)

- Gas test readings are within acceptable limits for entry
- Ensure:
 - Equipment to be used for work within the confined space (i.e., excavation) is inspected and confirmed fit for purpose, for example:
 - Excavator
 - Power hand tools (e.g., Stihl Saw)
 - Mechanical Compactor (i.e., Wacker Plater); and
 - Non-Mechanical Hand Tools
 - The work required within the confined space (i.e., excavation) is performed safely, in accordance with planned arrangements as defined in:
 - Risk Assessment and Method Statement (RAMS)
 - Work Control Permit (WCP); and
 - Clearance Certificate
 - The Entry Attendant:
 - Remain in attendance at the excavation throughout entry
 - Monitor activities within the excavation
 - Report unsafe acts of unsafe conditions to thew Entry Supervisor; and
 - Take action to evacuate the excavation if conditions change or an incident occurs
 - The Authorised Entrants:
 - Perform assigned work tasks safely
 - Use equipment and tools correctly
 - Evacuate the excavation when instructed to do so by the Entry Attendant
 - Report unsafe acts of unsafe conditions to thew Entry Supervisor
- Take action to address unsafe acts or unsafe conditions immediately

8. MONITORING WORK PERFORMANCE & WORK COMPLETION

The Contractor (i.e., Entry Supervisor) will:

- Monitor work activities related to confined space entry (excavation) to ensure:
 - Work activities are carried out in accordance with the work control documentation
 - Any required field checks (e.g., alignment, etc.) are performed and recorded
 - Work activities within the confined space (i.e., excavation) are performed in accordance with the work control documents, for example:
 - Risk Assessment and Method Statement (RAMS) pe
 - Work Control Permit (WCP)
 - Clearance Certificate; and
 - Rescue Plan, when necessary
 - Waste is correctly stored or disposed of off-site
 - When not in use:
 - All mobile equipment is parked safely and secured; and
 - All handheld tools are removed from the excavation and stored securely
- Note 8.1:** Until excavated areas have been fully restored to **ground level** the work site must remain secured against unauthorised access (e.g., fencing, warning tape and lighting).
- On completion of the work activities within the excavation, confirm:
 - All waste and/or excess materials are removed from the work site

- Mobile equipment is parked safely and secured
- Handheld tools are removed and stored securely
- Barriers, warning tape, signage, and floodlighting remain in place, if necessary and
- The work site is safe and ready in all aspects, for any required further work
- Sign-off the relevant work control documents, for example:
 - Clearance Certificate; and
 - Work Control Permit (WCP)