

Instruction

Doc. No.: 2010-0053691

HSE instruction on overhaul and maintenance projects

Scope RWE Generation NL

Prepared by Safety GES-NL

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Document information

Version	Version date	Authorization		
2.5	21-08-2024	Manager Safety GES-M - Ronald Kamst		
Publication	Doc2E	KMS	Contractor site	GC-NL Connect site
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Consent of Works Council			Reference	n.a.

Changes from the previous version

- Stated more clearly in the text that the H&S project plan must be present at the construction site and also the relevant H&S work plans must be present at the relevant workplaces.
- Added/strengthened the obligation for the Contractor to provide a HSE work plan in a timely manner in the way described.
- Added that communication about HSE Project plan and HSE work plans must be included in the Project kick-off meetings/ kick-off instructions

Purpose of instruction

Providing guidelines for complying with the obligations of the Working Conditions Decree, Section 5, Construction Process, and ensuring safe working practices within a project.

Target group

All companies and employees involved in (large-scale) maintenance or modification projects carried out on the premises of RWE Generation-NL

Related documents

Type of Document	Title	Code
process	P014-VGM Procedure for overhaul and maintenance projects	P014
Instruction	Safety observations and workplace inspections	1019
plan	RWE HSE project plan	F014-000
plan	RWE HSE work plan NL	F014-001
plan	RWE HSE work plan EN	F014-003
plan	RWE HSE Workplan DE	F014-002



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form	Registration project instruction	F014-007
form	Conflicting activities (annex 11.4 HSE project plan)	F014-005
form	HSE project plan checklist	F014-006

Terminology and abbreviations

Term or abbreviation	Description	
TRC	Total recordable case, incident with injury resulting in medical treatment, modified work or absence from work	
LTI	Lost time injury, incident resulting in absence from work	
Dutch Labour Inspectorate	Inspectorate of the Ministry of Social Affairs and Employment	
KMS	Quality management system, is a comprehensive set of all required procedures, processes, policies, results and records within a company	
HSE Plan	The Health, Safety and Environment Plan (the Health and Safety Plan referred to in Section 2.28 of the Working Conditions Decree), supplemented by the environmental section.	
HSE Work plan (Suppliers)	Plan with HSE data for Suppliers working in control of a project	
RI&E	Risk Inventory and Evaluation as referred to in Article 5 of the Working Conditions Act.	
Task Risk Analysis (TRA)	A Task Risk Analysis is a structured method of assessing the risks associated with a limited number of tasks and activities, after which appropriate control measures can be drawn up (see instruction 1002 - Task Risk Analysis).	
Coordinator for the design phase	The natural or legal person who is charged with the tasks listed in Article 2.30 of the Working Conditions Decree relating to health and safety during the study, design and elaboration phases of the design of a structure (design phase).	
Coordinator for the implementation phase	The natural or legal person who is charged with the tasks listed in Article 2.31 of the Working Conditions Decree in relation to health and safety during the realisation of a construction project (the implementation phase).	
Supplier	Party carrying out work directly on behalf of the client and/or supplying material/equipment or having it supplied.	
(under)- Supplier	Party that either directly or by order of a Supplier performs or causes to be performed activities and/or supplies or causes to be supplied material/equipment.	
Drafting Party	The person who has committed himself to the Client to fulfil the designing role in the construction process.	
Client	The person on whose behalf a building (the Project) is constructed. is established.	
Project safety expert	The project safety expert is the person in the project team who assists and supports the project manager in the area of HSE activities. A project safety expert evaluates the inventory of HSE bottlenecks and measures per (main) activity and advises on the realization of a project-specific Risk Identification (RI). This RI will be distributed via the project management (HSE project plan) to the suppliers who will use it to further develop their HSE work plan. During execution, the project safety expert is the one who provides the project team with solicited and unsolicited information and	



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	advice on all matters relating to safety, health, etc. that are important to create and maintain a safe and healthy work environment.
Project management	The person or party who is in charge of the day-to-day management of the project.

Introduction

Scope

The instruction and plans as discussed in this document are applied to the (large-scale) overhaul, maintenance and modification or new construction projects that are realized within RWE in the Netherlands as part of the maintenance or expansion of existing installations.

Drawing up (and maintaining) a HSE project plan is a legal obligation. This is laid down in the Working Conditions Decree, among other things. The legal terminology for this is a H&S plan ("Health and Safety Plan"). RWE prefers to use the term HSE project plan ("health, safety and environment project plan") because it wishes to emphasise that the statutory HSE plan covers a number of relevant business and environmental aspects for the Project. To avoid any misunderstanding, it is emphasised that the HSE project plan must be understood as the H&S plan in accordance with the law and that all the requirements that the law imposes on the H&S plan apply to it in full.

Furthermore, the purpose of this HSE instruction and the HSE project plan is:

- the creation of criteria and conditions to prevent incidents/accidents at the workplace;
- promoting HSE care for and by all companies and/or persons involved in all activities relating to the project in question.

Notification of supervisor

A notification to the Dutch Labour Inspectorate (digital) of intended work is legally required when:

- The estimated duration of the construction work/project exceeds 30 working days and more than 20 workers will be working simultaneously, **or**
- the construction/project involves more than 500 man-days.

Safety objectives Project

For each project we want to prevent incidents with absence, substitute work or medical treatment, because everyone should go home as healthy and sound as he came to work. So TRC = 0!

For RWE Generation, the targets for LTIF (lost time injury frequency) and TRCF (total recordable case frequency) are set annually.

The projects in particular must therefore make an effort to achieve these targets. For this reason, the targets for the year in question are included in the HSE project plan.

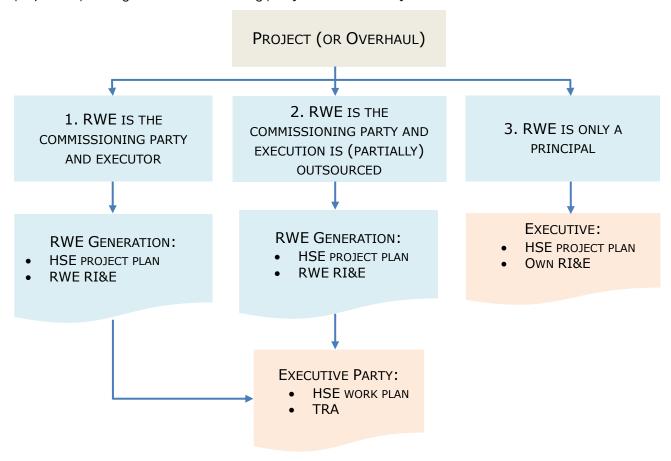


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Responsibilities and obligations

The diagram below shows the HSE obligations of the parties involved during a maintenance project, depending on who the executing party is. RWE will always be the client.



RWE GENERATION:

- APPOINTS A COORDINATOR FOR THE DESIGN AND IMPLEMENTATION PHASE
- Depending on the size of the case, reports to the Dutch Labour
- 1. RWE is both the Client and the Executing Party. RWE then also bears all obligations with respect to drawing up the HSE project plan and supervision.
- 2. RWE is the commissioning party, but the implementation is (partially) contracted out. If this is the case, the executive parties will draw up their own HSE work plan for their activities (see formats). If two or more parties collaborate, RWE will appoint one or more Coordinators for the design phase and one or more Coordinators for the execution phase.
- 3. RWE is exclusively the Client. In that case, the Working Conditions Decree, section 5 construction process (articles 2.23 up to and including 2.35), also apply to RWE



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Tasks and obligations in the Design and Implementation phases

The Project Lead:

- Appoints the Coordinator of the design phase and the Coordinator of the execution phase on behalf of RWE as the Client:
- Is responsible for fulfilling the obligations as referred to in article 2.32 and 2.33 of the Working Conditions Decree.

During the Design Phase (obligations of the Client):

- Takes steps to ensure that the Design Phase Coordinator is able to fulfill and properly perform his duties;
- Ensures that the HSE project plan is part of the specifications and with the H&S Work plan is available at the construction site.

During the Implementation Phase:

- Appoints the Coordinator for the implementation phase;
- Defines in a written agreement the appointment of the Coordinator for the implementation phase;
- Takes action so that Coordinator for the execution phase can fulfill and properly perform his duties;
- Ensures that the HSE project plan forms part of the specifications for the construction work and is available at the construction site before commencement of the work; The H&S Work plan must be available at the workplace itself.
- Provides the notifications to, and contacts with, the government, such as permit applications.
 The notification to the Inspectorate SWZ is made digitally via the portal on the Internet. The
 notification is part of the project documentation and must be clearly visible and published on
 the building site during the project.
- Evaluates the Project and makes adjustments if necessary.

Coordinator for the design phase:

The coordinator for the design phase has the task, among others, of acting on behalf of the client:

- a. to ensure that the employers and self-employed workers concerned are able to meet the obligations on working conditions which apply at the implementation stage;
- b. draw up a safety and health plan (HSE project plan) or have one drawn up (see Format RWE HSE Project Plan);
- c. draw up a safety and health file intended for the person who decides on the future use or demolition of the construction works. This file shall contain the structural and technical information on the specific construction work that is relevant for the safety and health of workers and self-employed workers engaged in the use or demolition phase;
- d. to include in the HSE project plan the HSE work plans of the contractors involved and the project-specific RI&Es and TRAs;
- e. coordinates the implementation of the Client's obligation to ensure that the obligations for working conditions that apply in the execution phase are taken into account in the design phase;
- f. Carries out all other obligations arising for him from the Working Conditions Decree.



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Coordinator for the implementation phase:

- a. Its task is to ensure that the measures taken by employers and self-employed workers on construction sites to protect their safety and health are applied effectively;
- b. In the interests of the protection of workers and self-employed persons, it is the task of the employer to ensure that employers and self-employed persons present at the same time or in succession at the construction site coordinate their work properly;
- c. Provides information to workers on the construction site:
- d. Take the necessary measures so that only authorised persons can enter the construction site;
- e. Should ensure that the safety and health plan, and the file are updated if the progress of the construction work or its components so requires;
- f. Take effective measures if employers or self-employed persons do not, in its opinion, implement their obligations under points a and b coherently or do so insufficiently or incorrectly.
- g. Carries out all other obligations arising for him from the Working Conditions Decree.

Client:

- a. take steps to ensure that the coordinator for the design and implementation phases is able to carry out his duties properly;
- b. ensures that the HSE project plan is authorised before commencement of work;
- c. ensures that the obligations for the executing party are laid down in a written agreement.
- d. Ensures that through a kick-off meeting prior to the start of work, the contents of the HSE Project Plan are known and understood by the performing parties and what safety documents, including the Contractor's HSE Work Plan (completed, and approved) must be present at the work site during the performance of the work;
- e. Ensures that through a mandatory kick-off instruction for all workers on the construction site, the measures as mentioned in the HSE project plan are observed, and that this will be maintained through safety observations (see IO19).

Implementing Parties (Suppliers):

To the extent that RWE is involved in the execution, these obligations also apply to RWE.

- Supply a completed HSE work plan, including a list of activities with special risks and control measures, based on the RWE Risk Matrix;
- Drafting the applicable TRAs:
- Prior to and during the work, communicate with the employees, employers and self-employed persons working under their direction about the content of the HSE project plan, the HSE work plan, the RI&E and the TRAs;
- Update the HSE work plan and the supplements to reality;
- Ensure regular inspection of activities and HSE conduct of deployed personnel and subcontractors:
- Guarantee the management and coordination of deployed personnel and subcontractors to prevent incidents and/or accidents;
- Provide the Client with all the necessary information to enable it to carry out the required inspection of compliance with the HSE regulations. Ensure that work is supervised and performed according to the discussed measures of the on-site, work permit, HSE work plan, TRA and LMRA.

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- Guarantee correct fulfilment of all obligations as stated in this HSE project plan and relevant legislation and regulations;
- Carry out all other obligations arising for them from the Working Conditions Decree.

Obligations of sub-suppliers and self-employed persons:

Sub-suppliers and anyone deployed by a Supplier for the execution of work are under the responsibility and supervision of the Supplier who has deployed the Sub-supplier for the execution of part of the work.

HSE project plan and HSE dossier

HSE project plan during design phase

- is the most recent template HSE project plan (see Management System under Forms);
- supplemented by the specific or different data of the Project;
- supplemented by the specific or exceptional data of the establishment;
- supplemented by the HSE work plans of the Engineering parties involved in the work;
- supplemented with the project-specific RI&E and draft TRAs;

HSE project plan during implementation phase:

- is the HSE project plan from the design phase;
- supplemented by sub-RI&Es;
- supplemented with, among other things, definitive TRAs, transport plans, lifting plans, asbestos removal work plans, radiation work plans and drawings/calculations for special scaffolds;
- supplemented by the updated and/or new HSE work plans of the Engineering parties involved in the work;
- supplemented with special (project-related) instructions;
- and other requirements of the law.

In special cases, the Principal may deviate from this for routine work or a job of limited scope and low risk, which can be performed safely with a work permit and LMRA. This is always at the discretion of the Principal/licensee.

HSE documentation

HSE project documentation consists of:

- the most up-to-date HSE project plan;
- supplemented with registrations, for example of kick-off instructions, toolboxes, permit training, HS&S tours, etc;
- supplemented by reports and records (notifications and incidents, contractor evaluations), etc;
- supplemented with minutes and action lists from the project meetings with regard to VGM.

HSE dossier (Article 2.30)



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The HSE dossier is intended for the person who decides on the execution of subsequent work on the construction, and contains the constructional and technical characteristics that are important for the safety and health of employees who perform subsequent work.

References

Occupational Health and Safety Decree

- Chapter 2 section 5 construction process
- Chapter 3 section 2 additional requirements for construction sites

Management system

- Management handbook
- Management manual revisions