

CONSTRUCTION HEALTH AND
SAFETY SPECIFICATION
FOR THE
REFURBISHMENT OF HANKEY
WWTW IN KOUGA MUNICIPALITY

DOCUMENT INFORMATION SHEET

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WWTW in Kouga Municipality

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SIGNING OF THE ORIGINAL DOCUMENT

We, the undersigned, accept this document as a stable work product to be placed under formal change control as described by the Procedure: Management of Controlled Documents.

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| Date: | Name: L. Mzamo |
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1. Definitions

For the purpose of this Construction Health and Safety Specification, all definitions in the Occupational Health and Safety Act & Regulations, the abbreviations and the definitions given hereunder shall apply:

- 1. "Agent" refers to L.Mzamo & Associates (Pty) Ltd represented by a Professional Construction Health and Safety Agent appointed to act on behalf of the Client, and who is appointed in writing.
- 2. "Client" refers to Kouga Municipality.
- 3. "COIDA" means Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 4. "Competent person" means a person who
 - a. has in respect of the work or task to be performed the required knowledge, training and experience and, where applicable, qualifications, specific to that work or task: Provided that where appropriate qualifications and training are registered in terms of the provisions of the National Qualification Framework Act, 2000 (Act No 67 of 2000), those qualifications and that training must be regarded as the required qualifications and training; and
 - b. is familiar with the Act and with the applicable regulations made under the Act;
- "construction manager" means a competent person responsible for the management of the physical
 construction processes and the coordination, administration and management of resources on a
 construction site including overseeing occupational health and safety;
- 6. **"construction site"** means the approved construction footprint and grounds where construction work is being performed as part of this contract.
- 7. **"construction supervisor"** means a competent person responsible for supervising construction activities on a construction site:
- 8. "construction vehicle" means a vehicle used as a means of conveyance for transporting persons or material, or persons and material, on and off the construction site for the purposes of performing construction work; and, includes a bakkie or LDV used by the principal contractor or any contractor
- 9. "CHSS" refers to this document, the Construction Health & Safety Specification
- 10. "CR" refers to the Construction Regulations, 2014
- 11. "COC" refers to Certificate of Compliance.
- 12. **Confined Spaces**" means an enclosed, restricted or limited space in which because of its construction, location or content or any work activity carried on therein, a hazardous substance may accumulate, or an oxygen-deficient atmosphere may occur and it includes any chambers, tunnel, pipe, pit, sewer, container or objects in which a dangerous liquid, gas, vapour, dust or fumes may be present.
- 13. "DSTI" refers to a documented daily safe task instruction compiled and issued by a contractor and trained to all relevant employees
- 14. "excavation work" means the making of any man-made cavity, trench, pit or depression formed by cutting, digging or scooping;

- 15. **"fall arrest equipment"** means equipment used to arrest a person in a fall, including personal equipment, a body harness, lanyards, deceleration devices, lifelines or similar equipment;
- 16. "fall prevention equipment" means equipment used to prevent persons from falling from a fall risk position, including personal equipment, a body harness, lanyards, lifelines or physical equipment such as guardrails, screens, barricades, anchorages or similar equipment;
- 17. "fall protection plan" means a documented plan, which includes and provides for
 - a. All risks relating to working from a fall risk position and work where there is a risk of dropping materials.
 - b. The procedures and methods to be applied in order to eliminate the risk of falling and dropping of materials on persons; and
 - c. A rescue plan and procedures;
- 18. "fall risk" means any potential exposure to falling either from, off or into;
- 19. "H&S" refers to Health and Safety
- 20. "Health and Safety Plan" refers to a documented plan which addresses hazards identified and includes safe work procedures to mitigate, reduce or control the hazards identified.
- 21. "Health and Safety Specification" refers to a documented specification of all health and safety requirements pertaining to the associated works on a construction site, so as to ensure the health and safety of persons.
- 22. "medical certificate of fitness" means a valid medical certificate of fitness; such medical testing shall be relevant to the risks of the construction work performed on site and shall conform to the Occupational Health and Safety Act and Regulations and to the requirements in this H&S specification.
- 23. "**Method statement**" refers to a document detailing the key step by step activities to be performed in order to reduce as reasonably as practicable the hazards identified in the risk assessment.
- 24. "OHSA" refers to the Occupational Health & Safety Act of 1993
- 25. "Principal Agent/Engineers" refers to the lead consultants of the project appointed by the Client.
- 26. "Principal Contractor" means an employer who performs construction work for the client and who is appointed by the client.
- 27. "Regulations" refers to the Regulations issued under the Occupational Health & Safety Act.
- 28. "S" refers to a Section in the Occupational Health & Safety Act of 1993.
- 29. "Sub-Contractor" means an employer appointed by a contractor of the Principal Contractor to perform construction work on the Site; also means an employer appointed by a sub-contractor to perform work on the Site.
- 30. **"SACPCMP"** means the South African Council for the Project and Construction Management Profession

2. Project Purpose and Scope of works

1. The project entails the design and construction of mechanical and electrical works for Emergency Remedial Works and Upgrade of the Infrastructure in Ndlambe Municipality. The works is as follows:

PROPOSED REINSTATEMENT AND NEW INFRASTRUCTURE

HankeyWWTW:

The proposed reinstatement of damaged infrastructure is as follows:

- 1. Inlet to process plant
- a. Valves, concrete works, piping and flowmeter, etc.
- 2. Aeration Plant





- a. Major repair works
- 3. Clarifiers
- a. Repair centre structure, motors, handrailing bridges, etc.
- 4. Sludge bed
- a. Refurbish airlift, enclosure with steel door, etc
 - 5. Security
 - 1. Install complete new security fencing and access gates (±270m)
 - 2. Pepper spray modules for control room
 - 3. Alarm system linked to armed response
 - 4. Security gates to control room two doors
 - 5. Battery backup for security
 - 6. Electrical distribution
 - 1. Distribution board in control room
 - 2. Incoming enclosure
 - 7. General Civils
 - 1. Building repair main building
 - 2. Repairs to secondary structures
 - 8. Sterilisation
 - a. Install UV sterilisation system

Kwanomzamo Sewer Pump Station:

The proposed reinstatement of damaged infrastructure is as follows:

- 1. General Civils
- a. Building repair or demolish and reconstruct main building.
- 2. Electrical distribution
- a. Complete new system
- 3. Security
 - 1. Install complete new security fencing and access gates (±80m)
 - 2. Pepper spray modules for control room
 - 3. Alarm system linked to armed response
 - 4. Security gates to control room two doors
 - 5. Battery backup for security

3. Introduction

- 1. This Construction Health & Safety Specification is published in terms of the Occupational Health & Safety Act of 1993 (OHS Act), Construction Regulations 2014, Regulation 5(1)(b).
- 2. The CHSS does not replace the Construction Regulations, 2014, but is a supplementary specification as required in terms of the Regulations.
- 3. Partial references to or quotes from the Regulations do not imply that the sections not referred to or quoted from are of lesser importance or are not applicable.
- 4. The Principal Contractor with all other sub-contractors is, at all times required to and will remain responsible to fully address all requirements and standards of the Occupational Health and Safety Act, Regulations and the full Construction Regulations in the Health and Safety Plan and the implementation thereof.
- 5. The client is committed to ensuring that the highest standards of health and safety prevail and this CHSS may contain standards which are more onerous that the statutory standards.

4. Limitation of liability

- 1. The client or its Agent shall not be responsible for any acts or omissions of any Contractor which may directly or indirectly result from the application of the CHSS or any project specific version thereof.
- 2. All contractors must ensure that articles, work, equipment, machinery, plant and work practices are, at all times, compliant to the legal requirements as these apply.
- 3. The client shall limit its responsibility to the application of the Construction Regulations' Client Requirements only.

- 4. This CHSS is developed to ensure that the Client and any bodies that enter into formal agreements with the Client such as Consultants, Principal Contractors, and Principal Contractors achieve an acceptable level of OHS performance. No advice, approval of any document required by the CHSS or the Agent, such as hazard identification and risk assessment action plan or any other form of communication from the client or the Agent shall be construed as an acceptance of any obligation that absolves the Principal Contractor from achieving the required level of performance and compliance with legal requirements. Further, there is no acceptance of liability by the client or the Agent which may result from the Principal Contractor failing to comply with the CHSS.
- 5. The Principal Contractor shall enter into a Mandatary Agreement with the client, as defined in Section 37(2) of the Occupational Health and Safety Act. The Principal Contractor shall ensure that each contractor appointed by the Principal Contractor and each and sub-contractor appointed by a contractor also enter into a Mandatary Agreement with the client, as defined in Section 37(2) of the Occupational Health and Safety Act.
- 6. The Principal Contractor shall be appointed by the client in terms of the Construction Regulations of 2014.
- 7. These agreements and appointments shall be included in the Principal Contractor's H&S file on site and be valid for the duration of the contractor's work on the construction site.

5. Purpose of the Construction H&S Specification

- The purpose of the CHSS is to be used as the standard of H&S on this project on which Principal Contractors', Designers and other project representatives plan their project implementation thus ensuring safe work execution and legal compliance.
- 2. This CHSS will be applicable to all construction work at this project.
- 3. All employees working on these sites shall conform to the standard in the CHSS. All the duties of a Principal Contractor in this CHSS equally apply, in full, to contractors of such Principal Contractor and to sub-contractors of such contractors.
- 4. This specification also applies to all project Designers and specialist consultants rendering a professional service on the project.

6. Implementation of the Construction H&S Specification

- 1. This CHSS forms an integral part of the Contract, and Principal Contractors are required to make it an integral part of their contracts with subcontractors and suppliers.
- 2. Any Principal Contractor submitting a tender for the Construction for this project shall ensure that the tender contains sufficient evidence of:
 - a. Adequate provision for the cost of health and safety measures;
 - b. The principal contractor's access to and intention to appoint persons with the necessary competencies to carry out the construction work safely;
 - c. The principal contractor's access to the necessary resources to carry out the construction work safely;

7. Designer

- The Designer which happens to be the Principal Contractor's Representatives must ensure that all designer's duties defined in the Construction Regulation 2014 are complied with thus taking into consideration the applicable SANS requirements during the design development.
- 2. The designer is incorporate a safe design approach as part of the project implementation and consider suitable ergonomic design principles for all phases of the project life cycle.
- All designers are to inform the Principal Agent and the Client of their designs and the potential cost implication for the design considering the geotechnical-science aspects and the loading that the structure is designed to withstand.
- 4. Make available all relevant information required for the safe execution of the work.
- 5. Refrain from including anything in the design necessitating the use of dangerous procedures or materials hazardous, which can be avoided by modifying the design or by substituting materials.
- 6. Take into account the hazards relating to any subsequent maintenance of the structure and must make provision in the design for that work to be performed to minimize the risk.
- 7. Carry out all necessary inspections at appropriate stages and verify that construction is carried out in accordance with the design.
- 8. Stop any Contractor from executing any construction work which is not in accordance with the relevant design's H&S aspects. Inspect the completed structure and declare the structure safe for use.
- 9. Designer are to inform the Principal Contractor of any design changes as part of project implementation.

8. Provision for cost of H&S

- 1. The appointed Principal Contractor shall allow in their tenders for the cost of complying with the requirements of this CHSS and the legislative requirements based on the project scope of works.
- 2. The principal contractor shall be required to submit the priced OHS BoQ to be part of the Bid Submission.

| | H&S cost item |
|----|--|
| 1. | SACPCMP-registered safety officer from the start of construction until the end of project handover. |
| 2. | Provision of Health Safety Plan |
| 2. | Provision for Emergency Preparedness and Response (First Aid, Emergency Rescue, etc.) Management and Equipment |
| 3. | Provision for firefighting management |
| 4. | Provision for confined space entry work |
| 5. | Provision for working at heights and near Water Course |

| 6. | Medical certificates of fitness Medical examination of all employees and certification of fitness by an occupational medicine practitioner. Pre-employment, annual and exit medical examination is required. Further Provision of vaccination of workers that will be exposed to raw sewer to receive a Hepatitis A&B Vaccination. |
|-----|--|
| 7. | Provision for risk-based PPE considering the scope of works |
| 8. | Barricading of excavations |
| 9. | Waste Bins on site and regular removal as well as General Environmental Management on site |
| 11. | Construction signage, including directional signs to the various work areas on sites |
| 12. | Allow for the necessary Workman's Compensation Fund or approved Insurer contributions for the duration of the project with and including renewals |
| 13 | H&S management file |

9. Scope

- The detailed scope of works on this project is as per the detailed information as issued in the Tender Document.
- 2. This CHSS covers the client's requirements for addressing, mitigating and controlling Occupational Health and Safety related risks, problems, incidents and injuries during the said construction work for this project. The scope addresses legal compliance, hazard identification and risk assessment, and the promotion of a health and safety culture amongst those working on this project.
- 3. The CHSS contains clauses that are generally applicable to building, engineering and construction and imposes controls associated with activities that impact on human health and safety.
- The Principal Contractor is required to comply with the provisions of the OHSA, all applicable Regulations, relevant SANS codes, and this CHSS.
- 5. The Agent will monitor the Principal Contractor's compliance with the requirements of the OHSA and their H&S Plan.

10. Construction Works Permit or Notification of Construction Work

Based on the estimated Contract Value, duration of the project as well as estimated Man-hours of this project, it is not envisaged that a Construction Work Permit will be required. Therefore the Principal Contractor should submit a Notification of Construction Works to the Regional Department of Employment and Labour situated in Kariega. Proof of acknowledgement of receipt of such notice shall be kept on file. However should the any of the above requirements trigger the Construction Work Permit requirement, then the following shall apply:

1. The Principal Contractor shall assist the Agent in compiling the evidence required by the Department of Labour for the issuing of a Construction Work Permit.

- 2. The Principal contractor shall ensure that the correct H&S information is presented for approval and includes:
 - a) Appointment letter, Contract and CR 5(1)(k)
 - b) Signed mandatary agreement in terms of Section 37(2)
 - c) Signed Acknowledgement of specification and baseline risk assessment
 - d) Evidence that the Principal Contractor made adequate provision for the cost of H&S measures.
 - Evidence that the Principal Contractor has the necessary competencies and resources to carry out the construction work safely by providing Site Organogram - align appointments with CR 2014 and relevant regulations
 - f) A copy of the letter of appointment for Section 16.2 with competency proof.
 - g) A copy of the Letter of appointment of the Construction Manager CR 8(1), Safety Officer CR8(5) and Construction Supervisor CR8(7) + proof of the qualification certificates must be certified, certified identify document, and registration, where applicable
 - h) Proof of the registration of the Principal Contractor's safety officer with the SACPCMP must be submitted as well.
 - i) Valid letter of good standing with the COIDA.
 - i) H&S Policy
 - k) Project Specific H&S Plan.
 - I) Project emergency management plan
 - m) Project baseline risk assessment
 - n) Demolition risk assessment & method statement
 - o) Confined Space entry risk assessment & method statement
- 3. The Principal Contractor shall display the work permit number at the main site entrance. The permit number must be noticeable in big numbers to the satisfactory of the Department of Labour.
- 4. The construction works can only commence once the construction work permit is issued by the Department of labour.
- 5. The conditions of the construction work permit must be compiled to for the duration of the project.
- 6. The legal appointments in terms of the application to the Department of Labour is crucial and must be adhered too for the duration of the project, any changes to such appointments must be formally communicated to the Agent and the Client for approval.
- 7. A list of additional information from the Agent will be issued when the need arises and when applying for the construction works permit.

11. Construction Manager

- 1. The principal contractor shall appoint a full-time competent person as the construction manager with the duty of managing all the construction work on the Site.
- 2. The construction manager must be exclusively dedicated to this project/site.
- 3. Proof of competency of the construction manager shall be incorporated in the H&S file; the client or its Agent shall only allow work to commence if the designated construction manager has sufficient evidence of H&S competence and, as a minimum this shall include:
 - a. Proof of professional training
 - b. Proof of experience in the construction scope of work relevant to this project nature
 - c. Proof of experience in general H&S management for work as defined in the scope
- 4. The construction manager shall be responsible to ensure that the following duties are executed and shall actively communicate with the client-agent in order to:
 - a. Confirm and provide proof of compliance; and
 - b. Discuss any compliant constraints which may be experienced.
- The construction manager may be assisted by the safety officer and, where such an arrangement is planned, the H&S plan of the Principal Contractor shall clearly define the respective duties of the construction manager and of the safety officer.
- 6. The construction manager shall be appointed in writing and each of the tasks below shall be included in the signed letter of appointment.
- The construction manager shall present the site-specific health and safety plan, based on this health
 and safety specifications to the client agent and shall discuss and amend the H&S plan until finally
 approved by the Agent
- 8. The construction manager shall ensure that the H&S plan is applied from the commencement of and for the duration of the construction work.
- 9. The construction manager shall ensure that the H&S plan is reviewed and updated as work progresses.
- 10. The construction manager shall open and keep the Site health and safety file and ensure that, at all times, this file is on site and available to an inspector, the client, the client's agent or a contractor.
- 11. The construction manager shall provide contractors and sub-contractors with this CHSS.
- 12. The construction manager with support of the safety officer shall only approve a H&S plan of a contractor and a sub-contractor if there is sufficient evidence that the contractor:
 - a. Has made sufficient provision for health and safety measures during the construction process
 - b. Has the necessary competencies to perform the construction work safely; and

- c. Has made the necessary resources available to perform the construction work safely.
- 13. The construction manager shall ensure that all contractors appointed by the Principal Contractor have an approved H&S plan, prior to appointing the contractor and prior to allowing the contractor to start working on site.
- 14. The construction manager shall ensure that contractors have evidence of both registration and good standing in terms of COIDA and shall not permit any contractor to start work or to continue with work on site unless a valid Certificate of Good Standing is on site.
- 15. Additional to the requirements of the Construction Regulations, the Principal Contractors' construction manager shall ensure that all sub-contractors appointed by any of the contractors of the Principal Contractor comply with the construction regulations and, in particular, the construction manager shall:
 - a. Ensure that employees of these contractors are also inducted in the H&S induction program of the Principal Contractor;
 - b. Inform the Client Agent in writing (via e-mail) whenever a contractor or sub-contractor's H&S plan is approved.
- 16. The construction manager shall ensure that monthly site audits and document verification is conducted of all contractors and all sub- contractors on site.
- 17. The construction manager shall stop all construction work which is not in accordance with this CHSS or with the principal contractor's health and safety plan or which poses a threat to the health and safety of persons.
- 18. The construction manager shall ensure that, where changes are brought about to the design and construction on the site, sufficient health and safety information and appropriate resources are made available to any contractor to which the changes apply.

12. Construction Safety Officer

- 1. The Principal Contractor shall appoint a competent Construction Safety Officer for the construction work.
- The Construction Safety Officer shall be full time on the construction site and must be exclusively
 dedicated to this site and have at least three years working experience as a safety officer within the
 construction industry and particular the candidate must have experience working with civil, mechanical
 and electrical works.
- 3. The Principal Contractor shall define the duties of the appointed safety officer in the H&S file.
- 4. The safety officer shall have a valid registration with the South African Council for the Projects and Construction Management Professions (SACPCMP)
- 5. Proof of competence and registration of the appointed construction safety officer must be included in the H&S plan and file.
- 6. The authority and relationship of the safety officer with the construction manager must be documented in the H&S file.

13. Hazard Identification and Risk Assessment

- The Principal Contractor shall appoint a competent person to perform a site-specific baseline- and, thereafter, ongoing issue-based hazard identification and risk assessment. There may be more than one risk assessor appointed if this is required.
- 2. The competent risk assessor shall form part of the full-time construction team working on the construction site.
- 3. The risk assessment must be based on the scope of work, the site-specific materials required, and the site-specific machinery, equipment and structures applied during the construction on this project.
- 4. The client requires that an additional risk assessment is conducted and submitted to the Agent for verification when:
 - a. A new machine is introduced onto site
 - b. A system for work is changed or operations altered
 - c. After an incident or near miss has occurred
 - d. New knowledge comes to light and information is received which may influence the level of risk to employees on site.
- All risk assessments shall be conducted in terms of an acceptable and documented methodology and control measure must comply to the hierarchy of controls prior to commencement of work and in accordance with the provisions of the CR.
 - a. The baseline risk assessment shall documented.
 - b. Issue-based risk assessment, risk monitoring and risk review shall be done at the hand of pretask risk assessment communicated to all employers; a system of daily safe task instructions may be used. The risk assessment must include:
 - i. A daily tasks/activity list, step by step
 - ii. A daily documented listing of hazardous events
 - iii. A daily documented listing of H&S risk controls
 - iv. Proof of communication of the above to all employees: the client requires that the Principal Contractor shall ensure that all employees on site are conversant with the content of the all relevant risk assessments, the appropriate measures to either eliminate or reduce the identified risks. The Principal Contractor shall outline to employees what role they are expected to play in the Risk Assessment and control measure process.
- 6. The principal contractor shall include a method for risk review ensuring that the all risks on site are adequately managed

7. All risk assessments must document all H&S controls. Should the Principal Contractor commence any work without a compliant risk assessment or should the risk assessment not reflect the activities being undertaken, the responsible contractor may be instructed to be immediately stop that specific activity, and the Principal Contractor will have no claim against the client in such a case for lost time or costs, irrespective of whether it can be demonstrated that the work was being safely undertaken.

14. Possible Demolition of structure/s

- 1. The demolition work during the construction must be addressed through a specific issue based risk assessment and method statement by a competent person appointed in writing.
- 2. The method statement must include the engineering survey, where applicable, and shall be approved in writing by the construction manager.
- 3. The H&S plan must document the name, signed letter of appointment, competency and the curriculum vitae of the competent person(s) appointed to supervise all demolition work.
- 4. Safe work instructions for employees performing demolition works must be documented in writing.
- The principal contractor should assess the risk of asbestos material before demolition works are undertaken, should the contractor be uncertain of whether specific material is asbestos, the principal contractor should inform the Principal Agent immediately.
- 6. The risk of the demolition structure collapsing in an uncontrolled manner must be managed, all demolition works must be directed away from the temporary operational decanted areas.
- 7. The principal contractor should submit the demolition work risk assessment and method statement with the H&S file approval.

15. Confined Space Entry

- 1. The Contractor to ensure all confined space entry works are performed safely and a Confine Space Entry permit system is implemented before entering or works start within a confined space.
- 2. A Confined Space Entry risk assessment and method statement must be conducted, and all employees informed of the risk associated with Confined Space Entry works. The contractor should detail the confined space entry mitigation measures in the H&S plan. The contractor should ensure suitable equipment including rescue equipment is available to perform Confined Space Entry Works.

16. H&S Plan & File Requirements

- 1. The Principal Contractor shall provide and maintain an H&S File, containing all relevant documents as prescribed in the OHSS, the Construction Regulations of 2014 and all forms or records referred to that has relevance to specific legislation.
- 2. The H&S File shall be kept on site and available for inspection by the client Agent or the Department of Labour's Inspectors.

- 3. The content of the file is included in this specification, but additional items may be added.
- 4. The H&S plan should include and project back ground/introduction section taking into consideration the following:
 - I. Project name
 - II. Client details, name of responsible person and the business address
 - III. Principal Agent/Designer details, name of responsible person and the business address if applicable
 - IV. H&S CHSA details, name of responsible person and the business address
 - V. Principal Contractor, name of responsible person (16.2 appointee) and business address
 - VI. Completion project scope
- 5. The H&S plan should include a detailed site-specific overview of the
 - Scope of works and activities of the project; this overview must include all work controlled by the Principal Contractor, whether directly or through the services of a contractors or subcontractors.
 - An overview of the machinery and plant used in the project; this overview must include all
 machinery and plant directly or indirectly (through the services of a contractor or subcontractor) controlled by the Principal Contractor.

H&S Plan Content & Numbering

- 1. Index of the H&S Plan
- 2. Project scope of works
- 3. Scope & activities, machinery, plant, equipment, hazardous articles to be used
- 4. Health and Safety Resources and Budget
- 5. Construction manager: duty, responsibility, authority, document control and communication
- 6. Safety officer: duty, responsibility, authority, document control, communication
- 7. Principal Contractor H&S management processes
- 8. Management of the issue-based risk-, risk review- and risk monitoring
- 9. H&S Induction training and H&S competency management
- 10. General record keeping management
- 11. Contractor and Sub-contractor management
- 12. Site communication management
- 13. Fall protection plan and method statements for heights work
- 14. First aid, accident & incident and emergency management
- 15. Fire prevention and equipment management
- 16. Safety signage management
- 17. Access & on-site traffic and public H&S management
- 18. Excavation management
- 19. Electrical management
- 20. Hazardous chemical substances management
- 21. Construction plant and machinery management
- 22. Lifting Operations and Management
- 23. Occupational hygiene, occupational health and fitness for work management
- 24. PPE management

- 25. Safety Inspections and Inspection Register management
- 26. Internal Audit management
- 27. Waste management

H&S File Content & Numbering

- 1. Index of the H&S File
- Principal Contractor's Policies applicable to the construction site: Occupational Health and Safety Policy
- 3. Project and OHS organogram with contact numbers
- 4. Principal Contractor Appointment
- 5. Mandatary Agreement between client and the principal contractor
- 6. Proof of Construction Work Permit
- 7. Letter of Good Standing
- 8. Contractors Baselines Risk Assessment
- 9. H&S Plan
- 10. Induction Plan
- 11. Emergency Plan
- 12. Fall Protection Plan
- 13. Issue Based Risk Assessments
- 14. Construction Manager, Supervisor and Safety Officer letters of the appointed competent persons and evidence of competency (registrations, qualifications and other proof of competency)
- 15. Updated Employee List
- 16. Medical Certificates of Fitness
- 17. Legal appointment letters
- 18. Training and Competency Matrix
- 19. Training records
 - a. Employees H&S Induction records
 - b. Visitors Induction records
 - c. Records of training and competency for method statements
- 20. Incident Register & Investigation reports & COIDA Accident and incident management procedure
- 21. H&S Inspection Registers, list should be provided in the H&S Plan
- 22. PPE Issue Register
- 23. Internal Audits
- 24. Letters of approval of contractors and sub-contractors H&S Plans
- 25. Letters appointment of contractors and sub-contractors
- 26. Principal contractor's contractor- and sub-contractor audits
- 27. DSTI's
- 28. Audits by Client Agent
- 29. Corrective / Preventive Action plans for client audits
- 30. All supporting evidence deriving from the H&S Plan

17. Close-Out and Consolidated H&S file

- 1. The Principal contractor shall compile a consolidated H&S file with supporting evidence as requested and hand this to the Agent at the end of the construction for review and approval.
- The consolidated H&S file shall be in electronic USB format.
- The consolidated file shall include:
 - a. A copy of the Principal Contractor Contractual Appointment letter
 - b. The signed Principal Contractor Appointment with the Client
 - c. The signed 37.2 Agreement with the Client
 - d. Copy of the Construction Works Permit
 - e. A copy of the approved construction footprint drawing
 - f. The H&S file of the Principal Contractor, which, amongst the other, shall have dedicated chapters dealing with:
 - i. Project H&S plan Approvals Record
 - Project H&S management plans, Fall Protection, Emergency plan, Storm water management, Traffic management
 - iii. Project Contractor Baseline Risk Assessments
 - iv. Designer inspections/assessments and confirmation of conformance
 - v. Incidents registers & IOD investigation record
 - vi. COIDA Claim incidents and supporting medical treatment record
 - vii. Total Man-hours and Disabling Injury Frequency Rate statistics
 - viii. Monthly H&S performance report
 - ix. Monthly H&S audit reports from the consultants
 - x. Minutes of the monthly Health and Safety Committee meetings
 - xi. Pre- employment, annual and exit medicals records
 - xii. Record of project inductions
 - xiii. List of equipment and physical conditions inspections conducted, samples included in the close out folder.
 - xiv. List of DSTI's conducted, samples included in the close out folder.
 - xv. List of awareness talks conducted, samples included in the close out folder.
 - xvi. List of employees on the project with exit medicals
 - xvii. HIV Aid Program "what was done on the project in summary" with supporting evidence.
- 4. Handover of the consolidated H&S file must be done within two weeks of all personnel having been demobilized (i.e. when nil man-hours are recorded).

18. Induction and H&S awareness

- The Principal Contractor shall ensure the risk control measures for remote works and encountering of snakes and other animals are duly communicated to ensure risk mitigation measure are implemented.
- 2. Further to the project induction, the Principal Contractor shall develop a documented project-specific induction training plan that must be submitted for approval by the Agent, to ensure that all employees on site are conversant with:

- The risks of the construction project
- The controls documented in the H&S file
- The role of employees in ensuring health and safety on the construction site
- The emergency arrangements that are put in place by the Principal Contractor
- The general health and safety rules applicable to the site, inclusive of an introduction to whom the Construction Manager, Supervisors and Safety Officer is on site.
- 3. The Principal Contractor shall ensure that all employees have gone through the induction training before commencing duties on site.
- 4. The contents of the induction programme and method of ensuring that all employees are inducted will be documented in the H&S file and the Principal Contractor is advised that a generic induction or a human-resource induction shall not be sufficient for the client to accept the H&S planning for the construction work.
- 5. When working on the site, each employee of any contractor and sub-contractor accessing the site, including management, shall complete the principal contractors' induction; the principal contractor shall ensure that none of his or his contractors' employees accesses the site unless having been inducted by the principal contractor. Each visitor to the site shall be inducted in the risks and risk controls which the visitor may be exposed to; the visitor's induction and method to ensure compliance shall be documented in the H&S file.

H&S awareness

- b. The Principal Contractor shall conduct, on site, periodic toolbox talks, preferably weekly or before any hazardous work takes place. The talks shall cover the relevant activity and an attendance register must be kept and signed by all attendees.
- c. A record of who attended and the content of the topic will be kept on the site health and safety file as evidence of training.
 - i. Awareness training of management responsibility on site must be conducted with all management representatives including contractors and sub-contractors.

19. Incidents, Accidents, Near Misses and Emergencies

- 1. All near misses, incidents and accidents must be recorded, investigated and managed in accordance with the statutory provisions.
- 2. Each H&S incident, near miss and accident must be recorded in a register kept in the H&S file; a template of the register shall be included in the H&S file.
- 3. Every accident shall be reported to the Agent; that is as soon as the construction manager and safety officer of the principal contractor becomes aware of it.
 - a. Such reporting must occur via direct contact (person-to-person, via telephone or email)
 - b. Incident Investigation process must be followed by competent role players and a preliminary investigation report must be submitted to the Agent within 24 hours for review and comment.
 - c. Final investigation must be finalized by the Principal Contractor and submitted to the Agent within 5 working days, unless requested otherwise.
- 4. A record of all incident investigations shall be kept in the health and safety file and all records shall be made available to the client without exception; this includes records relating to Section 24 of the OHSA.
- 5. Where a fatality or permanent disabling injury or any incident referred to in Section 24 occurs on the construction site, the Principal Contractor must ensure that the provincial director is provided with a report

contemplated in section 24 of the Act, in accordance with regulations 8 and 9 of the General Administrative Regulations, 2013, and that the report includes the measures that the Principal Contractor intends to implement to ensure a safe construction site as far as is reasonably practicable.

- 6. The emergency arrangements shall be displayed on site and shall include:
 - a. A comprehensive emergency and evacuation plan
 - b. An emergency flow chart
 - c. An updated list of emergency telephone numbers
 - 7. A first aider must be on site in a full-time capacity irrespective of the number of employees on site.

20. Hot Work, Fire Risks, Fire Extinguishers and Fire Fighting Equipment

- 1. No open fires are allowed on site.
- No smoking is allowed on site, except in designated smoke areas, identified by the Principal Contractor. The H&S Plan shall include the Principal Contractors' arrangements for managing smoking on site.
- 3. All flammable products must be stored in an adequate storage facility; this process shall be documented in a method statement in the H&S file.
- 4. The Principal Contractor shall provide suitable fire extinguishers, which shall be serviced regularly, in accordance with the manufacturer's recommendations.
- Safety signage shall be prominently displayed in all areas where fire extinguishers are located. The Principal Contractor shall arrange for the training of the relevant personnel, in the use of fire extinguishers.
- 6. The fire extinguisher inspection registers and the letter of appointment of the competent inspector shall be included in the H&S file.
- 7. No hot work is permitted on site or in the builders' yard unless appropriate screens, fire prevention, fire extinguishing and a documented safe work permit system are all in place. If the principal contractor plans hot work, a method statement must be included in the H&S file for approval. Each person perform hot work shall be trained in the use of a fire extinguisher and this training shall be documented in the H&S file.

21. Live Energy Work and Electrical Reticulations and Machinery

- The Principal Contractor shall appoint a competent electrician who shall ensure zero potential of all electrical reticulations worked on and who shall ensure that dedicated power sources are safely removed during the construction.
- 2. The letters of appointment, proof of competency and registers applicable to these inspections shall be included in the H&S File.

- 3. All electrical cables shall be assumed "alive" and, where applicable, the Principal Contractor shall take adequate steps to ensure that employees and members of the public are prevented from accessing any electrical cables.
- 4. All existing electrical services must be assumed live at all times.
- 5. No live energy work shall be performed.
- 6. Contractors will ensure that all energy is isolated, that residual energy is purged, that energy sources are switched off and locked out by all employees working in the danger zone and are tagged, prior to any work being performed on the energy source or reticulation. The contractor shall include a zero Potential, Lock Out and Tag Out method statement and safe work instruction(s) in the H&S file.
- Any unsafe condition shall be reported immediately to the client and the Principal Contractor shall take immediate steps to prevent employees or members of the public from gaining access to the dangerous installation and the area surrounding it.
- 8. The Principal Contractor shall appoint a competent person to inspect all portable electrical tools, including leads. The letter of appointment and template of this inspection register shall be included in the H&S file.
- 9. The Principal Contractor shall include a method statement for the safe use of portable electrical tools, including the management of the hazards of extension leads.
- 10. Where applicable, the contractor shall include any 'electrical dangerous work procedure' in the H&S file.

22. Scaffolding & Fall Protection

- 1. The Principal Contractor shall submit the appointment letter and proof of competency of the competent persons appointed as:
 - a. Scaffold erectors
 - b. Competent person to inspect, maintain, move or dismantle scaffolds,
 - c. Competent person to supervise all scaffolding operations.
- 2. The H&S Plan must include the signed letters of appointment and the proof of competency.
- 3. The Principal Contractor shall ensure that all scaffolding complies with the requirements of the OHSA and Regulations and with the requirements of Temporary Works in this CHSS.
- 4. Scaffold erectors and inspectors must be formally trained and certified competent; such training must conform to the requirements of SANS 10085.
- 5. Scaffolds must be clearly tagged with safe access signage; scaffolds must be inspected daily prior to use and weekly by the scaffold inspector. All scaffolds on site must be individually identified and display a safe/not safe sign.
- 6. Inspections by the scaffold inspector must be documented on the scaffold tag and in a register; a template of the tag and of the register shall be included in the H&S file.

- 7. All scaffolds must be accessed with a ladder only. Ladders must be inside the scaffolds and hatches must close ladder-openings in decks.
- 8. All scaffold decks must be fully covered and barricaded so as to prevent persons working there from falling off.
- 9. Scaffold erectors must attach a fall prevention harness at all times; the double lanyards must be fitted with scaffold hooks only.
- 10. The H&S Plan shall include the safe work instruction applicable to all employees working on scaffolds and the method of ensuring competency.
- 11. Standard scaffolding designs, approved by a competent designer of the Principal Contractor may be included in the H&S file and all such scaffolds on site must conform to this standard.

Fall Protection and Fall Risk Work

- 1. The construction work includes high-risk fall risk work.
- 2. The Principal Contractor shall submit the name and the curriculum vitae of the competent person who has been appointed to prepare a fall protection plan together with the signed letter of appointment, in the H&S file.
- 3. The fall protection plan shall strictly comply with the requirements of the OHS Act, SANS10085-1, and the planning shall be commensurate with the fall risk work.
- 4. The fall protection plan shall include all fall risk work which is planned to be performed by contractors or sub-contractors.
- 5. The Principal Contractor and any contractor shall ensure that:
 - a. All fall risk work is planned and forms part of the daily safe task instructions; note that :
 - Work from a ladder or work where ladders are used as access tool are potential exposures of employee to falling either from, off or into and such work is considered 'heights work'
 - ii. There is no minimum of maximum height defining fall risk
 - iii. Fall risk work done on an ad hoc basis or which forms part of abnormal or emergency processes shall be risk assessed and employees shall be instructed in the safe work process prior to work commencing
 - b. Only trained and competent persons with a valid medical certificate of fitness are permitted to perform fall risk work
 - c. All medical certificates of fitness for fall risk work are issued by a registered occupational medical practitioner and are included in the H&S file
 - d. All elevated areas are reached by means of a ladder, scaffold or man cage; and climbing on machinery, installations or make-shift means of access is not permitted

- e. No person must be allowed to work under an area where there is a risk of falling tools or materials
- f. As far as reasonably practical all openings through which persons can fall are closed off with material which can support the weight of a person; such material shall be permanently fixed over the opening
- g. Where openings cannot be closed, a sturdy barricade of at least 1.5 m high, which adequately prevents persons from falling through the opening, shall be in place at all times
- h. Man-lift machinery is not used for lifting of materials in position
- 6. A copy of the fall protection plan, the signed appointment letter and proof of competency must be included in the H&S file.
- 7. Where the use of any harnesses is indicated in the fall protection plan, the H&S Plan shall contain the following:
 - a. The need for the use of fall prevention- or fall arrest harnesses
 - b. The safe application, attachment and maintenance processes for harnesses
 - c. The type of harness and the type of hook to be used and the specific attachment points applicable to the fall risk work
 - d. The method of storing the harnesses when not in use
 - e. The method and register for the safety inspection of harnesses
 - f. A fall recovery method statement.

23. Public Health and Safety

- These facilities are situated within close proximity of the members of the public that can access them. all sites shall at all times be monitored by the principal contractor to prevent the unauthorized access of persons to construction works areas.
- 2. Appropriate health and safety signage and information shall be displayed strategically along road paths leading to the site camp and the construction works area.
- 3. All members entering site must indicate in what capacity they are visiting site and a site register should be completed and on record by the principal contractor.
- 4. The Principal Contractor shall ensure that each person visiting the site shall be inducted to the site and such induction shall outline the hazards likely to arise from on-site activities and the precautions to be observed to avoid or minimise those risks.

24. Excavation

- 1. The letters of appointment and proof of competency of the competent excavation supervisors and inspectors shall be placed in the H&S file.
- 2. A template of the inspection registers must be placed in the start-up H&S file.
- The principal contractor shall take cognisance of the geotechnical study pertaining to the conditions of the construction site and must plan all excavation work in accordance with the recommendations of the professional engineer.
- 4. The principal contractor must ensure that every excavation, including all bracing and shoring where applicable, is inspected daily, prior to the commencement of each shift and that no person enters the excavation or works in a risk zone until the excavations is assessed and declared safe.
- 5. All excavations must be left open for the minimum of time required and those that are left open on the site must be protected by a barrier or a fence of at least one metre in height, as close to the excavation as is practicable. The protective barrier or fence must adequately prevent persons from falling into the excavation and barrier taping is not sufficient for this purpose.
- 6. Excavation shoring and bracing, if required, shall be designed by a designer appointed in writing, who shall inspect and approve the installed shoring and bracing.
- 7. Where persons work, inspect or test excavations, warning signs must be in place next to an excavation.
- 8. No unnecessary open holes or manholes must be left open and unattended.

25. Waste Management

- 1. The Principal Contractor shall appoint a person responsible for site-wide control & removal of scrap, waste and debris:
- 2. No hazardous waste, combustible materials and containers shall accumulate on the construction site;
- The Principal Contractor shall document a waste management method statement in the H&S file. Such method statement shall include all liquid, gaseous or solid waste produced during the construction process.
- 4. Waste management must comply with the Environmental legislation.
- 5. All waste skips removed from site must be recorded and a proof of final deposit at a registered waste site (waste disposal certificate) must be on record in the H&S file.
- 6. Provision must be made to remove rubble from site.

26. Crane and lifting machine equipment operations

The following shall apply to any crane used on site,

Each crane shall have (in the cab or operating area), the following legal documents on site at all times:

- a. The latest and up-to-date load certificate of the crane;
- b. A record of the 6-monthly inspection of the crane by a registered inspector;
- c. The crane operator(s) current crane license;
- d. The crane operator(s) medical certificate of fitness, issued by an occupational medical practitioner;
- e. The inspection register or certification of 3-monthly inspection of all lifting equipment used with the crane;
- The H&S Plan shall include the method statement for safe use of the crane, including the method of communication, the protection of fall zones and the for the roof trusses and other equipment or material being lifted.
- 3. The crane's load test certificates shall be included in the H&S file.
- 4. All lifting equipment and gear used on site shall be identified, SWL-indicated and listed in a register contained in the H&S file.
- 5. The requirements for cranes and lifting operations apply equally to delivery trucks and the principal contractor shall ensure that all deliveries requiring lifting or rigging comply with the legal requirements.
- 6. The H&S plan shall include a specific method statement listing the planned lifts and the planned methods of attachment and rigging.
- 7. Where material hoists are used on site, the principal contractor shall ensure compliance with Construction Regulation 19 and that competent persons are appointed in writing to ensure:
 - a. The correct design and engineering controls are applied on site;
 - b. The material hoist is correctly erected and commissioned and this is inspected and signed off on the applicable register by a competent person appointed in writing;
 - c. The material hoist is inspected and maintained by a competent person appointed in writing;
 - d. The material hoist's operation is documented in a safe work instruction and all users are trained and certified competent in its use.
 - e. The material hoist is inspected daily prior to use by a competent inspector.
- 8. Where man-lift equipment is used, the principal contractor shall ensure compliance with Driven Machinery Regulation 18 and that competent persons are appointed in writing to ensure:
 - a. That all scissors lifts, cherry pickers, forklift with man-cages or any other lifting machine used to lift personnel are used only by a trained and competent operator in possession of a competency certificate issued by and accredited provider who holds a valid accreditation issued by an authorised body, in terms of the SAQA Act, and who is approved by the Chief Inspector, in terms the Driven Machinery Regulation 18.
 - b. That all lifting machines are load tested and inspected as required in Driven Machinery Regulation 18 and that the records thereof are either with the machine or in the principal contractor's H&S file.
- 9. The principal contractor shall ensure that deliveries using cranes comply with the above requirements and that all legal documents are kept in the cab of the delivery truck whilst on the Client's site.

27. Occupational Health

- 1. The H&S file shall include:
 - a. All medical certificates of fitness for all employees working on the site, a list of all employees on site must be generated by the principal contractor and updated on a monthly basis. This list should include all sub-contractor as well.
- 2. The contractor should made provision for pre-employment, annual and exit medical examination.
- 3. The Principal Contractor and every contractor shall ensure that a person-job specification (PJS)is issued for each job title on the construction site. The PJS specification should be sent with each employee to the occupational medical practitioner in order for the medical testing and assessment to be relevant to the statutory requirements and the risk exposures.
- 4. All contractors shall use that occupational health examinations, medical surveillance and certificate of fitness are conducted for all employees working on the project.
- 5. The contractors should ensure all employees who will be exposed to treated effluent water must receive Hepatitis A or B injection as part of the medical examination at pre-construction. Training and awareness must be conducted to ensure the treated effluent water is not consumed by employees and only used for the application intended for. The contractor should ensure the correct PPE is used to mitigate risks to employees. Sufficient signage must be displayed indicating the treated effluent water are not drinkable.
- 6. The principal contractor should take note of the risk associated whilst working at pump stations. Facilities for washing of hands with soap and water on site is crucial for hygiene purposes.

28. Access, traffic management

- 1. All employees working at the construction project should travel in a vehicle which have seats firmly secured and adequate for the number of employees to be carried;
- 2. No employee shall be transported together with goods or tools.
- 3. Each vehicle shall always have a serviced portable fire extinguisher.
- 4. The Principal Contractor shall ensure that all employees and visitors are aware and comply with the site's safe speed restriction, defined by the principal contractor at the hand of the risk assessment.
- 5. Drivers should follow the directional signs to the site and further adhere to the speed limit of 20km/h through the university's road leading to the site.

29. Special precautions

- 1. The principal contractor shall ensure that each employee is made aware and signs an acknowledgment of understanding of the following health and safety hazards specific for work on site.
- 2. The Principal Contractor should ensure that people on site are made aware of high possibility of presence of Fauna and Flora with specific reference to Snakes, spiders, antelopes, etc. such species cannot be killed at all.
- 3. Due to the remoteness of the work area and possible injuries that could be encountered due to wild animals such as snakes, spiders, etc. a site-specific and detail Emergency and Response Plan is require to be prepared and included in the Safety File for evaluation and approval.
- 4. Annual Builders Shutdown Period:
 - a. If this project will run through the builder's shutdown period, the Principal Contractor must submit a Shutdown Plan or Procedure that will illustrate who, how, when and what control measures will be implemented to ensure the construction footprint is rendered safe and risk free during the National Builders Shutdown period.
 - b. This submission must be issued to the Agent who will submit it to the Principal Agent for final approval.

30. Hazardous- Chemical Substances/Agents

- 1. With respect to hazardous chemical substances used, the contractor shall ensure that:
 - a. Full Compliance of Hazardous Chemical Agents, 2021;
 - b. All SDS are included in the H&S file;
 - c. An HCS risk assessment is included in the H&S file;
 - d. The safe use, storage, emergency procedures and safe disposal of hazardous substances are addressed in a method statement/s, included in the H&S file;

31. Personal Protective Equipment and Clothing

- 1. The Principal Contractor shall ensure that every employee is issued with, and wears SABS-approved PPE, consisting of all PPE identified in the risk assessment.
- 2. All the contractors' employees shall wear full length overalls and shall wear identification with respect to the employer.
- 3. All employees performing construction work shall wear steel-capped safety boots and a hard hat.
- 4. Hard hats used by employees working with a fall risk shall have an adequate chin-strap.

- Employees working in the vicinity of mobile plant or construction vehicles shall wear a
 reflective vest; reflective stripes on overall do not meet the required visibility and shall not
 suffice.
- 6. The use of respiratory protective equipment shall be defined in the site risk assessment and validated at the hand of hygiene measurements of airborne pollutants for the specific risk.
- 7. The H&S Plan shall contain an outline of the PPE to be used and the management of such PPE on site, including the issuing of PPE, overnight storage, and all disposal of PPE.
- 8. Failure to use protective equipment as per the site risk assessment shall require disciplinary intervention and this process shall be documented in the site induction.

32. Signage

- 1. The Principal Contractor shall erect and maintain quality safety signage.
- The signage shall include, but is not limited to:
 - a. The construction work permit number displayed at the entrance if applicable
 - b. Access restrictions, Speed restrictions
 - c. Directional signs to site camp from the Property's Main Gate
 - d. A sign indicating that all visitors must report to the site office and must be accompanied by the principal contractor when accessing the site
 - e. The name and telephone number of the responsible person(s)
 - f. Emergency telephone number(s)
 - g. PPE to be worn at the particular site
 - h. Confined space entry
 - Where falling objects may occur, relevant barricading and warning signs must be erected to safe guard fellow employee from being struck by.

33. Mobile Plant Operations

- 1. All earth moving equipment shall be operated in accordance with good safety practice so as to protect the safety of the operator and other workers or persons in the area.
- 2. No person shall be permitted to ride on any construction vehicle or mobile plant is not appointed to do so.
- 3. Daily inspection registers are to be conducted and signed all by the responsible supervisor on a weekly basis.

34. Consolidated Close - Out Requirements

Please be advised in terms of the Construction Regulation of 2014, the principal contractor is required to develop and submit a consolidated Health, Safety and Environmental management file at project completion. The submission should be in electronic format and must be submitted to the L. Mzamo and Associates as the appointed Pr. Construction Health and Safety Agent on the project that will review the consolidated file and cancel Legal Appointments prior to submission to the client.

Summary of the Information verified during the close out audit process is as follow:

All the information listed below formed part of the project implementation.

- Project HSE specification
- Project Baseline risk assessment
- Construction work permit/Notification of Construction Works
- Contractual appointments (Client & Principal Contractor)
- Principal contractor legal employee appointment and Section 37.2 Agreement
- All HSE approvals has been conducted by Pr. CHSA
- HSE Policy
- All risk assessments, baseline and issue based by both principal contractors and sub-contractors.
- Project HSE Method statements
- H&S management plan and Environmental Management Plan
- Fall Protection management plan and Rescue Plan
- Emergency plan
- All project legal appointments
- Induction records & medical fitness certificates
- H&S Audit and Inspection records by Pr. CHSA
- H&S communication and awareness records
- Incident history
- All applicable inspection records (mobile plant, excavations, fire and first aid records etc)
- Technical compliance certificates or test reports for safe installation
- Certificate of Compliance for Electrical Installation

Handover of the consolidated H&S File can only commence once all personnel has been demobilized and nil manhours are recorded. Electronic submission must be provided to the appointed Agent.

ANNEXURE A

Acknowledgement of the H&S Specification by Principal Contractor

Construction Health & Safety Specification

Issued in terms of the Occupational Health and Safety Act, 1993

Construction Regulations, 2014

| representing Principal Contractor have satisfied with the content of this Construction Occupational Health and Safety Specification and shall ensure that the Principal Contractor, all contractors and sub-contractors and all employees on site comply with it. | | | |
|---|----------|--|--|
| Signature of Principal Contractor | Date | | |
| Signature of Agent | Date | | |

This document must be signed and returned to the Pr. Construction Health and Safety Agent.

ANNEXURE B

Client Baseline Risk Assessment (find attached)