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Loading and Unloading of Containers

Business Name:	ABN:	
Business Address:		
Contact Person:	Phone:	Email:

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU OF THE PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	

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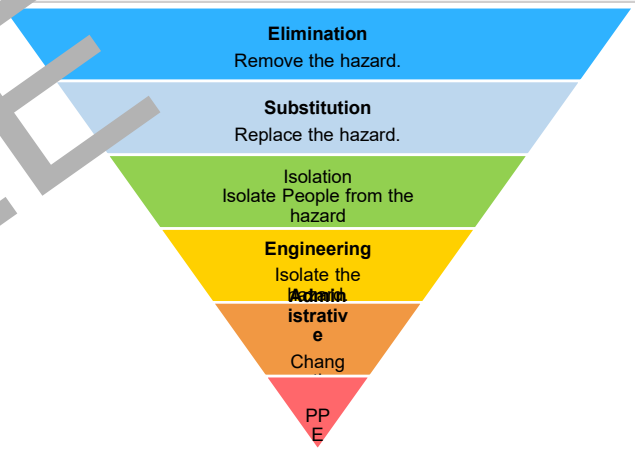
RISK MATRIX

LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE		
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Rev before work
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACU	2M MO RATE	Ensure control measures in place.
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 H	1L LOW	Monitor and keep records.

HIERARCHY OF CONTROLS



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Risk Rating & Required Action:

4A	Stop work. The risk is intolerable. E inate the hazar redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or hi er-level authorisati is required.
3H	Review and approve additional c rols b ask arts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in ace and effe ive. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures Monitor and keep records.

Consequence Scale:

Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. Substitute
3. Isolate
4. Engineering
5. Administrative
6. PPE

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work *(2023) and ISO 45001:2018 clauses 6–8.*

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JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, WHS Duties and Legal Compliance	• Lack of clearly defined WHS roles, responsibilities and accountabilities for loading and unloading of sea containers under the WHS Act 2011 and WHS Regulations • Failure to identify and manage overlapping duties between PCBU, principal contractor, transport providers, stevedores and labour hire providers • Inadequate consultation, cooperation and coordination with other duty holders sharing the workplace or undertaking connected activities (e.g. port operators, freight forwarders, customs brokers) • Absence of a formal WHS risk management framework specifically addressing container loading, unloading and oversized cargo handling • No systematic review of compliance with relevant Australian standards, codes of practice, marine orders and port authority requirements • Insufficient resourcing (time, budget, competent people) allocated to the WHS management of container handling operations	High	• Establish and document a WHS governance structure that clearly allocates responsibilities for container loading, unloading and oversized cargo management to competent persons, aligned with WHS Act 2011 duty of care requirements • Develop and implement a formal WHS risk management procedure for container operations, including hazard identification, risk assessment, control implementation and review specific to sea containers and shipping container unpacking • Implement a process to identify and manage overlapping duties with other PCBUs (e.g. written WHS interface agreements, site access controls, shared risk registers and joint meetings) • Align internal policies and procedures with applicable legislation, relevant Safe Work Australia model codes of practice (e.g. 'Managing risks of plant in the workplace', 'Traffic management in workplaces') and industry guidance for loading and unloading of containers • Undertake scheduled compliance audits against WHS legislation, internal procedures and port/terminal rules, with corrective actions tracked to closure in a central system • Ensure adequate WHS resourcing for container operations, including budget for engineering controls, training, supervision, competency assessment and specialist consultation where required • Schedule annual management reviews of the WHS management system performance for container operations, with documented outcomes and improvement actions	Medium
2. Contractor, Labour Hire and Third-Party Management	• Use of transport operators, freight handlers or unpacking contractors who lack verified competence in safe loading and unloading of sea containers • Inadequate vetting of labour hire personnel engaged for shipping container unloading and oversized cargo handling tasks • Absence of clear WHS performance expectations and KPIs in contracts with transport companies, stevedores and unpack depot operators • Poor induction, orientation and site familiarisation for third-party personnel entering the workplace or unloading facility	High	• Implement a contractor and labour hire management procedure that includes prequalification, WHS capability assessment and reference checks specific to container handling work • Include explicit WHS requirements in contracts and service level agreements, such as competency requirements, training standards, fatigue management, and adherence to site traffic and container unpack procedures • Require contractors to provide documented risk assessments and relevant safe work procedures for loading, unloading and oversized cargo handling, and review these for adequacy before work commences • Establish a mandatory site WHS induction program for all contractor and labour hire workers that covers container-specific hazards, restricted zones, emergency procedures and reporting expectations • Assign a competent contract manager or WHS representative to oversee third-party activities, undertake periodic field verifications and address non-conformances promptly • Implement a shared incident and near-miss reporting process with contractors, including joint investigations and agreed corrective actions for container-related events	Medium

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	• Inconsistent supervision and monitoring of contractor compliance with WHS procedures, PPE requirements and traffic management plans • Lack of incident reporting, communication and investigation protocols between the PCBU and contractors, causing repeat or systemic failures to go unaddressed		• Maintain a contractor performance register including WHS leading indicators (e.g. training completion, audit results, inspection findings) and lag indicators (e.g. injuries, damage, near misses) for management review	
3. Planning, Scheduling and Journey Management	• Inadequate planning of delivery times, truck movements and container unloading sequences leading to congestion, queuing and unsafe workarounds • Poor coordination of arrival times for road vehicles, forklifts and container handling equipment, increasing collision and loading dock interface risks • Failure to consider journey management factors such as driver fatigue, long-distance haulage, port curfews and weather conditions impacting container delivery • Insufficient assessm… suitability, laydown …eas and access routes for oversize… cargo removal from containers • Last-minute changes to consignme… details, container contents or packi… configuration that are not …mm…icated to site supervisors or planners • No contingency plans for peak periods, vessel schedule changes, port delays or unplanned container inspections (e.g. customs, quarantine)	Hig…	• Dev… a docu… planning and scheduling procedure for all container movements, including time slots, …ax…um da… volumes and priority rules for unloading • Introd…e a …oking …lot management system for trucks to reduce congestion and queuing in loading and unlo…ding …eas • In…rat… journe… management requirements into contracts and internal procedures, including maximum driving …s, breaks, fatigue risk controls and escalation where time windows cannot be met safely • …nsure pre-planning for oversized cargo unloading, including engineering review of required laydown ar…s, lifting points, specialised equipment and exclusion zones before containers arrive on site • Implement a change management process requiring that significant variations to consignment or packing configurations are assessed for WHS implications and communicated to supervisors and operators • Develop contingency and surge plans for peak throughput periods, including temporary traffic management adjustments, additional supervision and extended operating hours only where safe and adequately resourced • Maintain communication protocols between transport schedulers, warehouse, port operators and customers to manage delays without compromising safety	Medium
4. Site Layout, Traffic Management and Access Control	• Poorly designed site layout causing interaction between pedestrians, forklifts, container handlers and trucks during loading and unloading • Absence of a formal, documented traffic management plan for container operations and shipping container unloading areas	High	[redacted]	Medium

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	• Uncontrolled access to loading docks, container stacks and oversized cargo laydown areas by unauthorised persons • Inadequate signage, line-marking, lighting or physical barriers in container movement zones • Lack of designated safe zones for drivers awaiting loading or unloading, leading to drivers standing in vehicle movement paths • Insufficient consideration of reversing, blind spots and restricted sight lines for large vehicles and container handling equipment		[redacted]	
5. Plant, Equipment and Container Handling Systems	• Use of unsuitable or poorly specified forklifts, reach stackers, cranes, container tippers or other plant for the type of containers and cargo being handled • Inadequate systems for inspection, maintenance and verifi[illegible] plant safety critical feature[illegible]uch as brakes, lifting devices and [illegible]fety interlocks • Lack of standardi[illegible] att[illegible]ents, lifting gear or restrain[illegible]ystems for oversized or irregular cargo within containers • Failure to ensure that plant meets Australian standards and manufacturer requirements for the loads, gradients and operating conditions at the site • No formal pre-use inspection and defect reporting system for container handling equipment • Insufficient controls over hire plant, contractor-supplied equipment and modifications or temporary attachments used during shipping container unloading	High	[redacted]	Medium

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6. Container Condition, Packing Integrity and Cargo Information	• Insufficient information from consignors regarding container contents, weight distribution, dangerous goods, fumigation status or internal securing methods • No systematic process to assess external container condition (e.g. structural damage, bulging doors, corrosion) before authorising unloading • Lack of procedures for dealing with unknown or suspect fumigants, odours or atmospheric contaminants inside containers • Inadequate management of misdeclared or overweight containers leading to equipment overload or instability risks • Poor communication and documentation of special handling requirements for oversized or awkward cargo packed in sea containers • Failure to integrate customs, quarantine or biosecurity requirements into WHS risk assessm[redacted]d site procedures	High	[redacted]	Medium
7. Training, Competency and Supervision	• Workers and cor[redacted]ctors inv[redacted] container loading a[redacted]ing not being formally trained or assessed a[redacted] competent for their roles • Lack of specific training [redacted]ards associated with sea containers, including load shift, hazardous atmospheres and oversized cargo handling • Supervisors lacking the skills to identify unsafe practices and to enforce WHS requirements consistently • No ongoing refresher training or verification of competency despite changing equipment, procedures or types of cargo • Inconsistent induction content between shifts, sites or labour hire providers	High	[redacted]	Medium

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	leading to variable awareness of container-related risks • Overreliance on informal on-the-job learning without structured competency assessment or documented evidence		[redacted]	
8. Procedures, Safe Systems of Work and Documentation Control	• Absence of documented procedures for loading, unloading and unpacking containers, especially where oversized cargo or complex lifting configurations are involved • Procedures that are overly generic, not reflecting site-specific conditions, equipment or cargo types • Outdated, inconsistent or hard-to-access documentation leading to workers following informal or unsafe practices • Lack of clear criteria for when higher-level planning tools such as job safety analyses or lift plans are required for specific container tasks • Failure to integrate WHS procedures with operational systems such as warehouse management, booking systems and security protocols • Poor communication of procedural updates and changes to affected workers, contractors and supervisors	High	[redacted]	Medium
9. Risk Assessment, Change Management and Project Planning	• Container-related risks not systematically assessed prior to introducing new routes, clients, cargo types or unloading methods • Changes to equipment, site layout or work schedules implemented without formal WHS impact assessment • Inadequate involvement of frontline workers and supervisors in risk assessment and change processes • Temporary workarounds or pilot projects for container handling becoming	High	[redacted]	Medium

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	business-as-usual without proper evaluation • Insufficient consideration of cumulative risks where multiple projects, high workloads or seasonal peaks overlap • Failure to capture learnings from previous incidents or near misses in subsequent project planning and risk assessments		[redacted]	
10. Health, Fatigue and Psychosocial Risk Management	• Fatigue among drivers, forklift operators and container handlers due to extended shifts, night work or irregular port schedules • High work pace and production pressure during vessel arrivals, cut-off times or peak import/export seasons • Exposure to environmental conditions such as heat, noise and weather during outdoor container operations without adequate controls • Stress and anxiety related to unclear procedures, conflicting priorities between safety and prod[illegible], or aggressive customer [illegible]eframes • Insufficient syste[illegible]s to identify and support workers ex[illegible] or mental health issues that may affe[illegible] safe performance • Poor rostering practices [illegible] to inadequate rest opportunities between shifts and increased fatigue-related error risk	[illegible]h	[redacted]	Medium
11. Emergency Preparedness and Incident Management	• Lack of specific emergency response planning for container-related incidents such as load collapse, plant collision, hazardous atmosphere exposure or oversized cargo instability • Emergency equipment, including rescue gear and first aid resources, not suited to container stack heights, confined container spaces or outdoor unloading areas	High	[redacted]	Medium

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SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
	• Inadequate training of workers and contractors in emergency procedures relevant to container operations, including evacuation routes from docks and laydown areas • Poor coordination with external emergency services regarding site access, container stack configurations and hazardous cargo locations • No structured process for incident reporting, investigation and corrective action specific to loading and unloading of sea containers • Failure to communicate lessons learned from container-related incidents across shifts, departments and sites		[redacted]	
12. Monitoring, Inspection, Audit and Continuous Improvement	• Lack of systematic monitoring of WHS performance related to container loadi and unloading activities • Infrequent or inconsistent workplace inspections of container yards, loading docks and oversized cargo areas • Failure to detect degradation of controls such as traffic man plant maintenance over ti • Under-reporting of near misses an minor incidents, resulting in mis opportunities to identify emerging risks • Audit findings and improvement actions not being tracked or closed out, leading to repeat non-conformances • Limited use of safety performance data to inform business decisions and resource allocation	Medium	[redacted]	Low

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EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory
Work Health and Safety Act 2011
Work Health and Safety Regulations 2011
Legislation QLD: https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws
Codes of Practice QLD: https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice
Legislation ACT: https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations
Codes of Practice ACT: https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice

New South Wales
Work Health and Safety Act 2011
Work Health and Safety Regulations 2025
Legislation NSW: https://www.safework.nsw.gov.au/legal-obligations/legislation
Codes of Practice NSW: https://www.safework.nsw.gov.au/resource-library/list-of-codes-of-practice

Northern Territory
Work Health and Safety (National Uniform Legislation) Act 2011
Work Health and Safety (National Uniform Legislation) Regulations 2011
Legislation NT: https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws
Codes of Practice NT: https://worksafe.nt.gov.au/forms-and-resources/codes-of-practice

South Australia
Work Health and Safety Act 2012 (SA)
Work Health and Safety Regulations 2012 (SA)
Legislation for SA: https://www.safework.sa.gov.au/resources/legislation
Codes of Practice for SA: https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs

Tasmania
Work Health and Safety Act 2012
Work Health and Safety (Transitional and Consequential Provisions) Act 2012
Work Health and Safety Regulations 2012
Work Health and Safety (Transitional) Regulations 2012
Legislation for TAS: https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations
Codes of Practice for TAS: https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.

Victoria
Occupational Health and Safety Act 2004
Occupational Health and Safety Regulations 2017
Legislation VIC: https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations
Codes of Practice VIC: https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice

Western Australia
Work Health and Safety Act 2020
Work Health and Safety Regulations 2022
Legislation Western Australia: https://www.commerce.wa.gov.au/worksafe/legislation
Codes of Practice WA: https://www.commerce.wa.gov.au/worksafe/codes-practice

Safe Work Australia Links
Law and Regulation (All States): https://www.safeworkaustralia.gov.au/law-and-regulation
Model Codes of Practice: https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

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