

Sewage Clean-Up

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

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS 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:	

SAMPLE

RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. 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.

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 Regulatory Compliance	<ul style="list-style-type: none"> Failure to clearly allocate WHS duties for sewage clean-up activities under WHS Act 2011 (PCBU, Officers, Workers, Others) Inadequate understanding of legal obligations regarding exposure to biological hazards, confined spaces, and hazardous chemicals Absence of a documented WHS management system that specifically addresses sewage and wastewater contamination work Poor contractor management leading to inconsistent standards across different service providers Insufficient consultation with workers and Health and Safety Representatives (HSRs) about sewage-related risks and controls 	High	<ul style="list-style-type: none"> Develop and maintain a WHS governance framework that explicitly includes sewage clean-up activities, roles, responsibilities and escalation pathways, aligned with the WHS Act 2011 and WHS Regulation Ensure Officers exercise due diligence by regularly reviewing sewage clean-up risk profiles, incident data and audit findings, and by resourcing appropriate controls (training, equipment, staffing) Establish a documented WHS management system (policies, procedures, standards) that specifically addresses sewage exposure, biological hazards, and associated high-risk work such as confined spaces Implement a formal contractor management procedure requiring all sewage clean-up contractors to demonstrate compliance with WHS legislation, provide risk assessments, and align with organisational policies before engagement Consult with workers and HSRs on sewage clean-up procedures and changes, and record consultation outcomes in line with WHS consultation requirements Schedule regular management reviews (e.g. annually or after significant incident) of sewage clean-up risks, controls and performance indicators, with documented action plans and accountabilities 	Medium
2. Risk Management Framework and Planning	<ul style="list-style-type: none"> Absence of a structured risk management process specifically for sewage clean-up operations Generic risk assessments that fail to capture site-specific hazards such as infrastructure condition, floor conditions, and community interface Inconsistent use of risk assessment tools leading to uncontrolled variations in risk tolerances between teams and contractors Failure to review and update risk assessments after incidents, near misses or process changes Poor integration of sewage clean-up risks into broader organisational emergency and business continuity plans 	High	<ul style="list-style-type: none"> Implement a standardised WHS risk management procedure aligned with ISO 45001/AS NZS 4801 principles for identifying, assessing and controlling sewage-related risks at a system level Require project-level and program-level risk assessments for sewage clean-up campaigns, including triggers for review (e.g. change in method, new equipment, new contaminants identified) Introduce a mandatory risk assessment template and risk matrix for sewage and wastewater activities, with defined organisational risk criteria and approval levels Integrate sewage clean-up risk assessments into emergency management and business continuity planning, including surge events (e.g. storms, floods, network failures) Establish a formal review cycle for all sewage clean-up risk assessments (e.g. 12 months or after incidents/legislative changes) with version control and documented sign-off Provide training and guidance to supervisors and planners on conducting and documenting high-level risk assessments for sewage-related work 	Medium
3. Organisational Competency, Training and Induction	<ul style="list-style-type: none"> Workers and supervisors lacking competency in identifying and managing biological and chemical hazards from sewage 	High	<ul style="list-style-type: none"> Develop a competency framework for sewage clean-up roles, identifying required qualifications, experience and behavioural expectations for each role (workers, supervisors, coordinators) 	Medium

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	<ul style="list-style-type: none"> Inadequate understanding of infection control principles, decontamination requirements and personal hygiene protocols Insufficient training in hazard identification, risk assessment and reporting for sewage clean-up activities Failure to induct new workers and contractors in organisation-specific sewage management procedures and expectations No refresher training or verification of competency leading to skill fade and unsafe short-cuts 		<ul style="list-style-type: none"> Provide structured induction that includes sewage-specific hazards (pathogens, sharps, gases), organisational procedures, and reporting expectations before any field deployment Implement mandatory training in infection control use of PPE for biological hazards, decontamination processes, and safe handling of contaminated materials Ensure supervisors and planners receive additional training in risk assessment, emergency response coordination, and escalation procedures related to sewage incidents Introduce a refresher training program at defined intervals and after incidents, and maintain a central training register to verify current competencies Require contractors to provide evidence of relevant training and competencies for sewage clean-up work, and to attend site-specific inductions prior to commencing work 	
4. Procurement and Management of Plant, Equipment and PPE	<ul style="list-style-type: none"> Procurement of unsuitable or non-compliant equipment for sewage clean-up (e.g. pumps, vac trucks, negative pressure units) Inadequate selection of personal protective equipment for biological, chemical and physical hazards Lack of a system to ensure equipment used in sewage environments is maintained, inspected and fit for purpose Supply chain issues causing PPE shortages during peak events such as floods or infrastructure failures No standardisation of equipment leading to inconsistent safety features and training requirements 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium
5. Exposure to Biological and Chemical Agents	<ul style="list-style-type: none"> Systemic underestimation of pathogen risks in sewage (bacteria, viruses, parasites) leading to inadequate controls Lack of organisational standards for vaccination programs relevant to sewage exposure (e.g. Hepatitis A and B, tetanus as per medical advice) Poorly defined policies for handling unknown chemical contaminants, trade 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<p>waste, and sewer discharges from industrial sources</p> <ul style="list-style-type: none"> • Inadequate procedures for managing sharps, clinical waste or illicit drug paraphernalia found in sewage systems • No monitoring program to evaluate exposure levels or the effectiveness of existing control measures 		[REDACTED]	
6. Work Design, Staffing and Fatigue Management	<ul style="list-style-type: none"> • Reactive scheduling of sewage clean-ups during emergencies leading to excessive hours and fatigue • Insufficient staffing levels during major sewage events causing rushed decision-making and poor risk controls • Inadequate consideration of psychological impacts of unpleasant or traumatic sewage incidents on workers • Poor rostering practices for after-hour sewage call-outs, including inadequate breaks and recovery • Failure to plan for competency mix in teams (e.g. lack of experienced supervisor in high-risk situations) 	High	[REDACTED]	Medium
7. Emergency Preparedness and Incident Response	<ul style="list-style-type: none"> • Lack of integrated emergency plans for large-scale sewage spills, system failures or overflows impacting the public • Unclear escalation pathways for sewage-related incidents that involve confined spaces, hazardous atmospheres or exposure incidents • Inadequate coordination with external emergency services, environmental authorities and local councils • No organisation-wide protocol for managing worker exposure incidents 	High	[REDACTED]	Medium

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	<p>(ingestion, splash to eyes, cuts, needle-stick)</p> <ul style="list-style-type: none"> Insufficient training and drills for incident commanders and supervisors dealing with sewage emergencies 		[REDACTED]	
8. Information, Documentation and Record Management	<ul style="list-style-type: none"> Critical sewage clean-up procedures and standards not formally documented, leading to inconsistent practices Out-of-date procedures that do not reflect current legislation, technology or organisational structure Poor accessibility of WHS documents, SDSs, and technical data for workers and contractors in the field Inadequate records of training, vaccination, health monitoring and exposure incidents Lack of data integrity and version control, causing confusion about which documents are current and approved 	Medium	[REDACTED]	Low
9. Contractor, Supplier and Stakeholder Management	<ul style="list-style-type: none"> Use of contractors for sewage clean-up without adequate verification of WHS capability and systems Inconsistent standards between in-house teams and contracted providers leading to variable risk levels Poor communication of site-specific sewage risks and organisational expectations to external parties Insufficient oversight of subcontractors, including those engaged by head contractors for sewage-related work Lack of coordination with property owners, tenants or the public during sewage clean-up activities, increasing risk of unauthorised access or exposure 	High	[REDACTED]	Medium

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			[REDACTED]	
10. Health Monitoring, Wellbeing and Rehabilitation	<ul style="list-style-type: none"> • Systemic failure to identify where health monitoring is required for sewage workers under WHS Regulation • Lack of procedures for early identification and management of work-related illnesses associated with sewage exposure • Under-reporting of health concerns by workers due to stigma or perceived normalisation of symptoms • Insufficient organisational support for psychological wellbeing related to frequent exposure to unpleasant conditions and emergencies • Poor return-to-work planning following illness or injury from sewage-related tasks 	Medium	[REDACTED]	Low
11. Incident Reporting, Investigation and Continuous Improvement	<ul style="list-style-type: none"> • Under-reporting of sewage-related incidents, near misses and hazards due to complex or punitive reporting processes • Inadequate investigation of systemic causes behind recurring sewage spills or worker exposures • Failure to share lessons learned from incidents across different teams and locations • No structured mechanism to track corrective actions to completion and evaluate effectiveness • Limited use of lead indicators (e.g. near misses, unsafe conditions) to prevent serious incidents 	High	[REDACTED]	Medium

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12. Environmental Interface and Public Health Protection	<ul style="list-style-type: none"> • Inadequate coordination between WHS and environmental management systems during sewage spills and clean-ups • Failure to assess and manage public exposure risks in areas affected by sewage overflows or backups • Poor communication with public health units, environmental regulators and local councils about sewage incidents • Insufficient controls to prevent re-contamination or spread of pathogens through inappropriate waste transport or disposal • Lack of clear organisational criteria for re-occupation or re-opening of affected premises after sewage clean-up 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

SAMPLE

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>

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>

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-codes-of-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>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-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>

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>

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

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.