



AUSTRALIAN STEEL INSTITUTE

Australian Steel Industry Logistics Safety Code of Practice

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PREPARED BY:	Steel Transport Safety Network
AUTHORISED BY:	Philip Casey Chairman Steel Transport Safety Network Australian Steel Institute State Manager - NSW & ACT Australian Steel Institute National Safety Group Manager
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Revision 4 Update – To cover off Global Mark NLSC review recommendations	
<ol style="list-style-type: none"> 1. Add review period – Include last review date and next review date. 2. Remove reference to the NLSC Guidelines 3. Added audit result notations to the definitions 4. Added minimum auditor qualifications. 5. Audit tool to be issued to auditee prior to audit being conducted 6. Added process for how an applicant becomes a signatory 7. Guidance for auditing signatories who operate over multiple sites 8. Added Audit process details 9. Added audit tool review period 10. Updated key network contact details 11. Updated subject matter contact details 12. Added attachment 2 regarding use of ASI LSC logo. 13. Removal of references to NSW RMS, WorkCover NSW & Long Distance Truck Driver Fatigue Regulation as now covered by HVNL. 14. Updated reference to NTC Load Restraint Guide 	
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DISCLAIMER

This Logistics Safety Code of Practice provides only a general guide to the Australian Steel Industry for complying with the Chain of Responsibility legislation. Compliance with this Code of Practice will not be taken to mean automatic compliance with Chain of Responsibility legislation.

While every effort has been made to provide accurate and up to date information in this Code, Australian Steel Institute and the Steel Transport Safety Network Group take no responsibility for any error, omission or defect in this Code and exclude all liability (whether in negligence or otherwise) for any loss or damage (including consequential loss or damage, and any penalties imposed) suffered or incurred, directly or indirectly, by any person or company acting in reliance on all or any part of this Code.

1.0 INTRODUCTION

The Australian Steel Industry Logistics Safety Code (ASI LSC) is designed to ensure that all participants are aware of their responsibilities in the supply chain when they control or influence the safe and legal carriage of freight. Not only should this produce a clear and equitable alignment of responsibility for the carriage of goods within the chain against the relevant standards and regulations, but it should also induce higher standards of accountability and good practice within the industry.

The Australian Steel Industry Logistics Safety Code is aligned to the National Logistics Safety Code (NLSC). Refer Figure 1. It is a requirement of the Australian Steel Industry Logistics Safety Code that Steel Participants and Transport Providers abide by the National Logistics Safety Code.

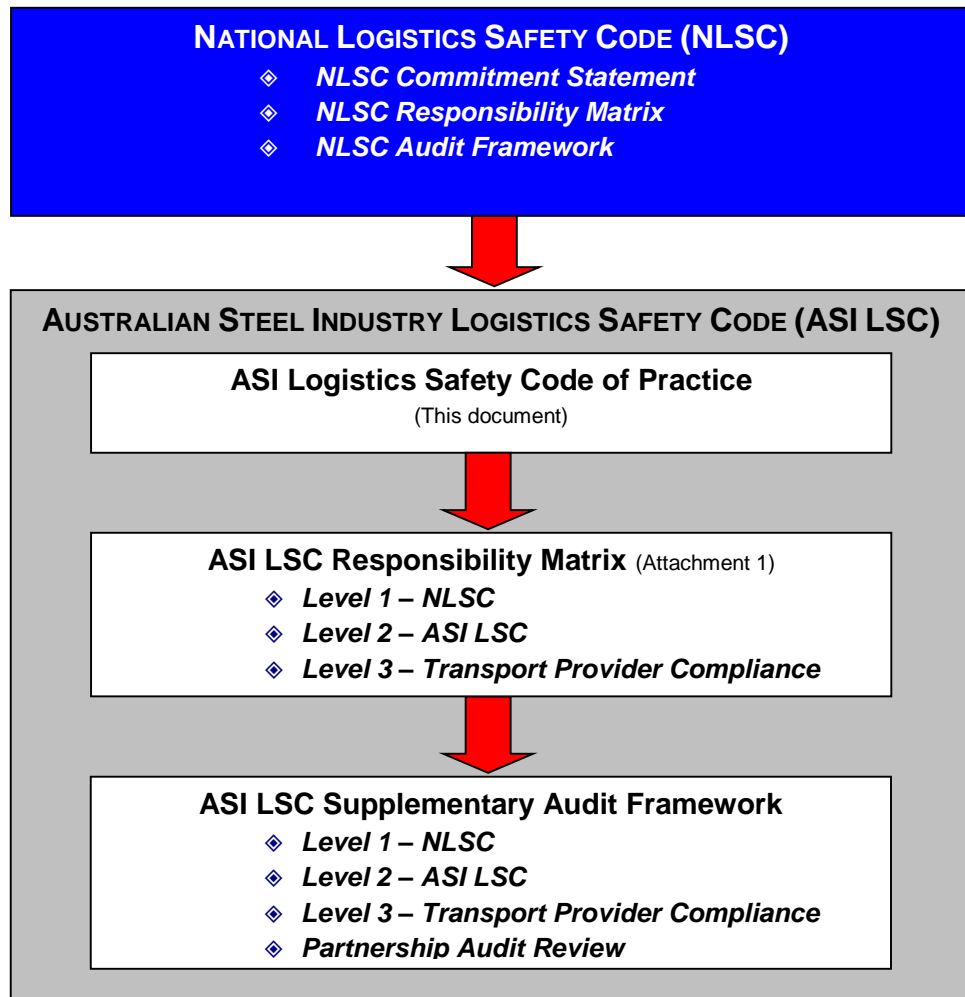


Figure 1. Relationship of NLSC and ASI LSC framework

2.0 PURPOSE

As signatories to the Australian Steel Industry Logistics Safety Code of Practice we recognise and accept our responsibilities in the steel industry Supply Chain.

All parties acknowledge and accept the National Logistics Safety Code *Commitment Statement* as follows:

1. We recognise and accept our obligations in the transport chain of responsibility to maintain and promote safe operations.
2. We undertake to comply with all road transport laws applying to our operations.
3. We, as manufacturers, suppliers, retailers or transport provider, will not knowingly make or meet any demand or requirement that would cause us to breach road transport laws applying to our operations.
4. We will actively support the development of appropriate industry Codes of Conduct, Codes of Practice and Guidelines for the purpose of promoting compliance with road transport laws.
5. We will also ensure that we have in place suitable and adequate processes, programs, policies and training so that we can demonstrate that we have taken reasonable steps to comply with all relevant laws.
6. We recognise and accept that our obligations include queuing and scheduling requirements, load and unloading facilities and equipment, well maintained, appropriately designed and equipped vehicles, fatigue management, driver health and safety, and safety and security requirements generally.
7. We will cause all new contracts or arrangements between us to include compliance with this code of conduct as a material requirement.
8. We recognise and accept that cost alone should not be the determining factor in meeting our obligations under this code.
9. We will actively support and assist the National Heavy Vehicle Regulator to meet its responsibility to develop appropriate uniform or nationally consistent road transport regulations and operational reforms.
10. This Commitment Statement, the National Logistics Safety Code and the Code Responsibility Matrix are intended to be read together.

The purpose of this Code is to provide guidance to the Australian Steel Industry in relation to:

- Controlling, managing, operating and auditing of Heavy Vehicle road transport freight movements;
- Minimising the risk along the steel supply chain associated with freight movements; and
- Complying with the Chain of Responsibility legislation, which imposes liability for Heavy Vehicle offences on all people and / or businesses whose actions, inactions or demands influence conduct on the road as well as on-road parties such as Drivers and Transport Providers.

The Code is not designed to replace any legal obligations arising from road transport or Occupational Health and Safety legislation.

In adopting this Code, each Steel Industry signatory ("Steel Participant") shall be individually responsible for implementing the necessary systems, procedures, and processes to achieve the purpose of the Code.

This Code is not intended to be anti-competitive in any way.

3.0 SCOPE

This Code encompasses practices in relation to:

- Fatigue management, including driver health and fitness for duty;
- Safe loading practices including mass, dimension and load restraint;
- Speed management;
- Vehicle compliance and safety; and
- Contractor safety including subcontractor management.

This Code applies to all Steel Participants and their employees, and Transport Providers or their representatives who have direct or indirect involvement in the Supply Chain and all Sites under the control of Steel Participants. This may include the consignor, loading manager, packer, loader, transport operator, driver and receiver (consignee).

4.0 DEFINITIONS

4.1 GENERAL DEFINITIONS

ASI means Australian Steel Industry, being companies engaged in Australia in the manufacturing or finishing, distribution or fabrication of steel products.

Chain of Responsibility (“CoR”) means the allocation of responsibility along the Supply Chain.

Consignee means a person who carries on business to whom a consignment of freight is to be delivered.

Consignor means a person who carries on business from whom a consignment of freight originates.

Contractor means a Transport Provider who contracts directly with the Consignor or Consignee.

Driver means a person who drives a Heavy Vehicle.

Good Practices means those actions or behaviours that are recommended for preferred outcomes but are not Key Criteria.

Heavy Vehicle means a motor vehicle or combination with a Gross Vehicle Mass (“GVM”) over 4.5 tonnes.

Incident means a risk or an outcome where harm or damage has been or could be done to people, plant, property or the environment by reason of a breach of the Chain of Responsibility legislation.

Key/Principle Criteria means those actions or behaviours that Steel Participants need to demonstrate in order to comply with this Code.

Loader means a person who loads freight or containers for transport by road onto a Heavy Vehicle.

Loading Manager means a person who manages premises where 5 or more heavy vehicles are loaded/unloaded each day or supervises or controls a loader/unloader.

Packer means a person who places items in packages, containers or on pallets for consolidation or streamlining processes for later freight movement.

Receiver means a person who takes physical receipt of transported goods at the end of the Supply Chain.

Scheduler means a person who has the responsibility for allocation of freight task assignment times along the Supply Chain.

Site means an area of owned or leased property where a Steel Participant has overall management control.

Site Manager means a Manager in charge of an individual Site at a given location.

Steel Participant means Steel Manufacturer, Steel Processor, Steel Fabricator or other steel industry participants who have committed by signing to this code.

Steel Transport Safety Network means nominated representatives from each of the Steel Participants to overview the steel industry approach to Chain of Responsibility.

Subcontractor means a party who enters into an agreement to work for a Contractor.

Supply Chain means the transport logistics chain, encompassing packing, loading, consigning, scheduling, carrying, driving and receiving.

Transport Provider means a person / business that transports freight for another person / business by means of a Heavy Vehicle Transport Provider encompasses Head Transport Providers, Self-employed Transport Providers, Subcontract Transport Providers and Customer Pickups.

S* – Significant Non Conformance audit result requiring short term action

NC – Non Conformance audit result requiring action

OFI – Opportunity For Improvement audit result implementation to be considered

4.2 AUDITOR DEFINITIONS

2nd Party Auditor means Steel Participant or Transport Provider personnel trained as an Accredited OH&S Auditor by a certified OH&S auditor trainer. 2nd party auditors are to be independent of the site being audited, for example, corporate or national business position holder.

3rd Party Auditor means a person approved by Steel Transport Safety Network and the Australian Logistics Council who is qualified as a Lead Auditor.

Auditor Qualification – Auditors must have the following minimum qualifications as well as steel transport industry experience:

- Lead auditor training in WHS Management Systems (JASANZ equivalent)
- LIF0003 – Ensure compliance with COR
- TLIF3063A – Implementation of fatigue management strategies
- TLID2004A – Load/unload cargo goods

5.0 RISKS

There are four main categories of risk in breaching our obligations. These are:

- Harm or damage to people, plant, property or the environment;
- Additional cost or lack of productivity;
- Loss of reputation or other public opinion; and
- Legal liability (e.g. fines, penalties or prosecutions).

6.0 ASI LOGISTICS SAFETY CODE RESPONSIBILITY MATRIX

Steel Participants will take reasonable steps to prevent a breach of road transport and OH&S legislation occurring, including adapting existing business systems to address the requirements of this Code including the ASI LSC Responsibility Matrix. (Refer Attachment 1)

The ASI LSC Responsibility Matrix identifies the operational requirements for the Consignor, Transport Provider and Consignee for Level 1 NLSC requirements (legal requirements), Level 2 ASI specific requirements and Level 3 Transport Provider compliance audit requirements.

7.0 AUDITING

The Australian Steel Industry Logistics Safety Code auditing requirements are, aligned to, and cascade from, the National Logistics Safety Code (NLSC).

There are three levels of auditing as outlined following, refer also Figure 2.

On applying to become a signatory, the Administrator or approved auditor will issue the audit tool prior to the audit being conducted.

7.1 LEVEL 1 – NLSC AUDIT REQUIREMENTS

Steel Participants will conduct audits in principle with the NLSC. This will include:

- Baseline audit to be conducted by a 3rd party auditor;
- Baseline audit to be conducted within 365 days of becoming a signatory;
- Annual compliance audit to be conducted within 365 days of the baseline audit;
- Annual compliance audit to be conducted by a 2nd or 3rd party auditor;
- Triggered audit initiated by any partner in the Supply Chain as the consequence of an event.

Transport Providers will conduct audits in principle with the NLSC. This will include:

- Baseline audit to be conducted by a 3rd party auditor;
- Baseline audit to be conducted within 365 days of becoming a signatory;
- Biannual compliance audit to be conducted within 730 days of the baseline audit;
- Biannual compliance audit to be conducted by a 2nd or 3rd party auditor;
- Triggered audit initiated by any partner in the Supply Chain as the consequence of an event.

After baseline audit is conducted and any S* are closed off the auditee will become a signatory. For a company to remain a signatory they must maintain these components as scheduled above.

7.2 LEVEL 2 – ASI LSC AUDIT REQUIREMENTS

The Level 2 audit includes the additional criteria identified in the ASI LSC Responsibility Matrix and associated ASI LSC Supplementary Audit Framework. This will include:

- Biannual Level 2 audit to be conducted on Steel Participants and Transport Providers;
- Biannual Level 2 audit to be conducted by 2nd or 3rd party auditors.

7.3 LEVEL 3 – TRANSPORT CONTRACTOR COMPLIANCE AUDIT REQUIREMENTS

The Level 3 audit will examine the Transport Provider's operation with the focus on criteria not covered by the Level 1 and 2 requirements. These will include regulatory compliance, processes and procedures, equipment selection and maintenance, personnel engagement and training and risk management. This will include:

- Biannual Level 3 audit to be conducted on Steel Participants that own transporting equipment, employ drivers, directly engaged vehicles and drivers;
- Biannual Level 3 audit to be conducted on Transport Providers;
- Biannual Level 3 audit to be conducted by 2nd or 3rd party auditors.

For signatories that operate on multiple sites then auditing should be scheduled to achieve a fair range of sites over the life time of code participation.

7.4 Partnership Audit Review

The aim of the Partnership Audit Review (PAR) is to share knowledge and solutions between parties to influence the best outcomes. This will include:

- Joint review of each party's audit findings;
- Parties that co-exist by location, contract or subcontract. Typically Consignor and Transport Provider operating out of the same site. However it may include Transport Provider and Subcontractor, Consignor and Consignee.

7.5 AUDITORS

All audits are to be conducted by accredited auditors, refer to Section 4.2.

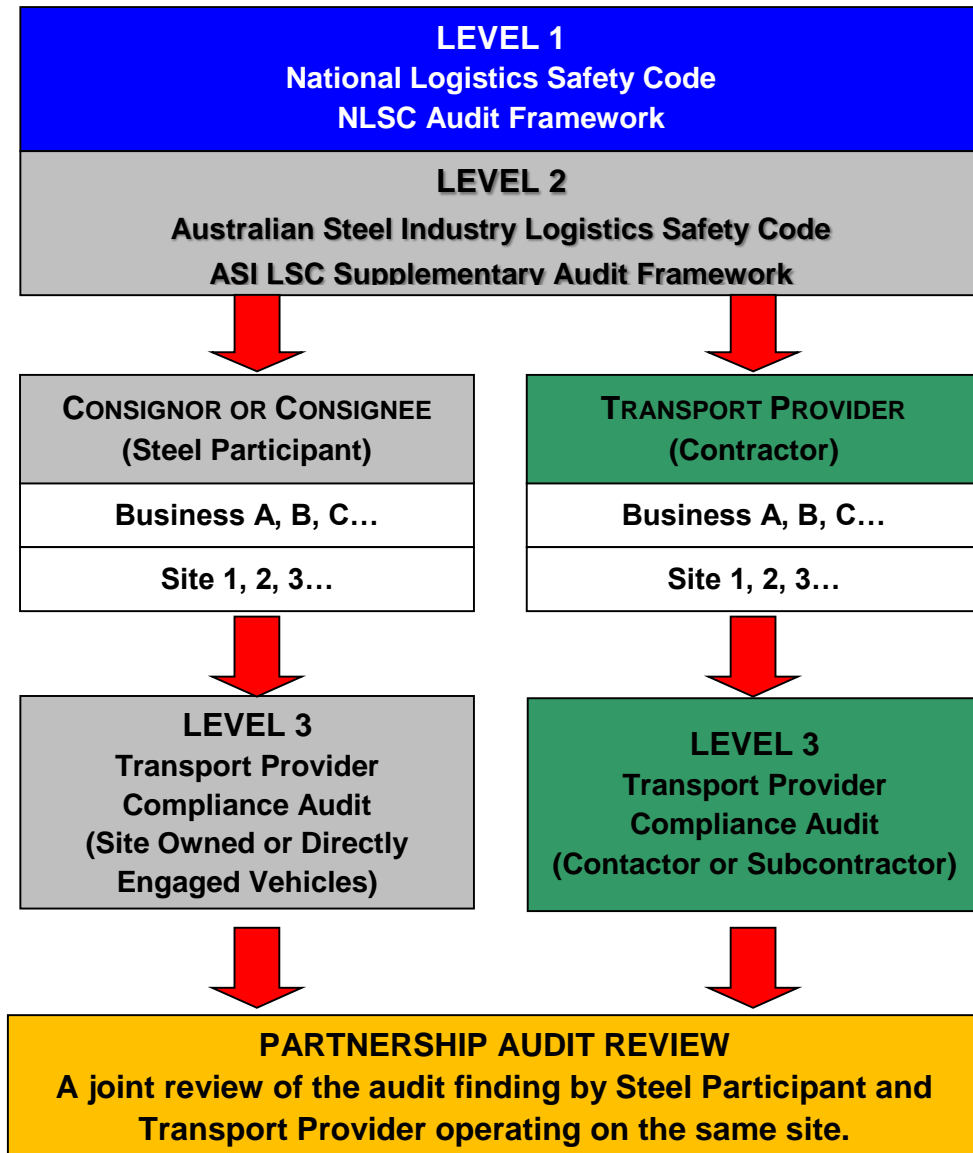


Figure 2. Outline of the ASI LSC audit requirements including level 1, 2 & 3 audit and partnership audit reviews

8.0 ADMINISTERING THE CODE

8.1 STEEL PARTICIPANTS

Steel Participants should actively support the ongoing maintenance of a Steel Industry Logistics Safety Code of Practice to better meet their legal obligations under the Chain of Responsibility legislation.

Without breaching confidentiality or the Trade Practices Act 1974 (Cth), Steel Participants should share high-level audit information to add rigour to:

- Better understanding their of legislative obligations;
- Reviewing desirable industry norms;
- Giving consideration to potential Code amendments; and
- Assisting each other in identifying and overcoming major Code compliance failures.

8.2 Auditing Process

The applicant is to complete an Application form to become a Signatory and sent it to the ASI LSC administrator.

The Administrator will knowledge the application by issuing a “Signatory Audit Pending” certificate & adding the applicants name to the ASI LSC website as a signatory pending.

The Signatory is to arrange their baseline audit with the auditor. Arrangements for the audit to be conducted are to be made within 30 days of receiving the pending certificate. At this time the signatory will be issued with a copy of the audit tool. The audit is to be completed within 365 days of receiving your pending certificate. The signatory can choose any auditor from the approved auditors list which can be found on the ASI website. This allows other audits, such as NHVAS or TruckSafe, to be conducted at the same time, if the auditor is suitably qualified. The cost of audits can vary between auditors and will be borne by the applicant.

Expected duration for audit to be completed – 1 day for level 1 with an additional 1 day for levels 2 & 3

The Auditor will then:

- Send out a Letter to the signatory regarding audit content, date to be completed and cost of audit.
- Notify Code Administrator with the Audit Plan for the Signatory.
- Complete the audit within 365 days of the applicant applying to becoming a Signatory.
- Develop Corrective Action Plan with the Signatory
- Issue audit report to the Signatory
- Lodge the audit report with the Code Administrator within 30 days of conducting the audit
- Notify the Code Administrator if any Significant Non-Conformances have not been closed out by the Signatory

The administrator will:

If any outstanding Significant Non-Conformances exist:

- Inform the Steel transport Safety Network. The STSN will act according to the Code's disciplinary requirements and assist to gain compliance if need be.

If No outstanding Significant Non- Conformances exist:

- Issue a "Signatory Audit Completed" certificate
- Add the Signatory's logo to the ASI LSC website along with contact details

The Signatory is to:

- Close out any Non- Conformances within 365 days of the audit being conducted.
- Review & close out any Opportunities for Improvement that they choose to implement within their business.
- Arrangements for their next audit to be conducted:

Steel Participants require Level 1 question to be audited within 365 days of their last audit. With level2 & 3 questions audited within 730 days of their last audit.

Transport Providers require all questions to be audited with 730 days of their last audit.

Conduct a Partnership Audit Review with other signatories that operate through the same supply chain

8.3 AUDIT NON CONFORMANCES

Non Conformances are failures to comply with the Key Criteria of the code and are to be actioned by the auditee as follows:

Level 1 Question Requirements:

- An **ACTION PLAN** is to be established within **48 hours** of the audit being conducted to address all **Significant non-conformances**. *Examples of significant non-conformances are: No systems in place for Risk, Fatigue and Speed management.*
- All **Significant non-conformances (S*)** are to be **CLOSED OUT** within **21 days** of the audit being completed.
- An **ACTION PLAN** is to be established within **30 days** of receiving the audit results to address all **non-conformances (NC)**
- All **non-conformances** to be **CLOSED OUT** within **365 days**.

Level 2 & 3 Question Requirements:

- An **ACTION PLAN** is to be established within **30 days** of receiving the audit results to address all **non-conformances**.
- All **non-conformances** to be **CLOSED OUT** within **365 days**.
- All opportunities for improvement (OFI) are left at the discretion of the auditee to action, as they primarily relate to good practices.

8.3 DISCIPLINARY PROCESS

Failure to meet the Significant Non-Conformance Action Plan and Close Out will result a suspension from the Code until such time the Significant Non-Conformances are Closed Out. Suspended Signatories have 12 months from the audit being conducted to Close Out any Significant Non-Conformances. If all Significant Non-Conformances are closed before this time they will be reinstated as a Signatory. If any Significant Non-Conformances are not closed out after 12 months from the audit being conducted the signatory will be removed from the Code.

Any Signatory that has to been removed from the Code can reapply to become a signatory to the code only after they can show that they have no Level 1 Significant Non-Conformances. Code Application and Audit requirements for all reapplying signatories remain.

8.4 THE STEEL TRANSPORT SAFETY NETWORK

The Steel Transport Safety Network is responsible for:

- The development and administration of the Code (either directly or indirectly), keeping the Code up-to-date and addressing proposed amendments thereto;
- Arranging for an accredited auditor to audit
- Reviews of the audit tool are conducted at least every 6 months (earlier if any major problems are identified) with key stakeholders;
- Endorse the Code and ensuring that reviews of the Code are conducted at least every three years (earlier if any major problems are identified); and
- Having the Code ratified by organisational bodies as may be deemed appropriate by the Network.
- Managing the signatory process in conjunction with the Administrator.

In developing the Code and making subsequent amendments thereto, the Steel Transport Safety Network shall:

- Hold regular meetings (at least every 6 months);
- Consult with organisations from time to time. This could include:
 - Regulators and other government bodies such as the National Heavy Vehicle Regulator and the National Transport Commission;
 - Industry organisations such as the Australian Steel Institute and the Australian Logistics Council; and
 - Other industry stakeholders as deemed appropriate.

8.5 KEY NETWORK CONTACTS

Phil Casey

Steel Transport Safety Network Chairman
State Manager, NSW & ACT
National Safety Group Manager
Australian Steel Institute
Level 13, 99 Mount Street PO Box 6366 North Sydney NSW 2059
philc@steel.org.au website: www.steel.org.au

Chris Fox

Lead Code Member
General Manager - Integration
OneSteel Limited
205 Pacific Highway St Leonards, NSW 2065
chris.fox@onesteel.com

Jeff Moore

Lead Code Member
Manager – Processing & Logistics
BlueScope Australia & New Zealand
Five Islands Rd Port Kembla, NSW 2500
Jeff.Moore@bluescopesteel.com

8.6 SUBJECT MATTER CONTACTS

David Clark

National Transport Safety Manager
OneSteel Limited
205 Pacific Highway St Leonards, NSW 2065
david.clark@onesteel.com

9.0 REFERENCES

- Australian Steel Institute
www.steel.org.au
- Australia Logistics Council (ALC)
www.austlogistics.com.au
- National Logistics Safety Code (NLSC)
<http://alcsafety.com.au/wp-content/uploads/2013/02/NLSC-Code-of-Practice-111001-V1.0.pdf>
- National Heavy Vehicle Regulator
www.nhvr.gov.au
- National Transport Commission - Load Restraint Guide (2nd Edition 2004):
<http://www.ntc.gov.au/heavy-vehicles/safety/load-restraint-guide/>
- National Road Transport Operators Association (NatRoads)
<http://www.natroad.com.au>

10.0 ATTACHMENTS

Attachment 1: Australian Steel Industry Logistics Safety Code Responsibility Matrix

Attachment 2: ASI LSC Value proposition including the authorised use of ASI LSC logo and its limitations

11.0 ACKNOWLEDGEMENT OF CONTRIBUTIONS TO THE CODE

In developing this Code, Steel participants acknowledge the contributions made by Government Departments, Industry Organisations, Heavy Vehicle Road Industry and in particular:

- Australian Steel Institute
- Australian Logistics Council
- Linfox Australia Pty Ltd
- Toll Group
- K&S Freighters
- Northline
- Gregorys

Current Steel Transport Safety Network Members:

- BlueScope
- OneSteel
- Toll Group
- K&S Freighters
- CMC Australia
- Stramit Building Products
- Kings Transport