

**Lotte Chemical Pakistan Limited
Port Qasim**

PROCEDURE NO.	HSE&S Procedure No. 3.01-01	Page 1 of 6
TITLE	Reporting Health, Safety, Environment & Security Information	
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Changes w.r.t organizations, designations and in line with HSE Management Audit (2017) findings

Contents

	Page No
1. Purpose	2
2. Scope	2
3. Definitions	2
4. Requirements	3
5. Communication and Training	6
6. Documentation	6
7. Reference	6
8. Amendments	6

1. PURPOSE

This procedure details the requirements and responsibilities for monitoring, recording and reporting HSE&S performance. It sets down the principles to be followed including the requirements for **Accident reporting and investigation including complaints** for taking action to prevent recurrence and for communicating information.

2. SCOPE

The **procedure** applies to all **Employees & Contractors** at Site, City Office and to Visitors present on the Site. It applies **reporting of Accidents relevant to reporting, Injury & Illness reporting, Motor Vehicle & Distribution incidents, Environmental incidents**. It also sets **principles for investigation each Accident event including complaints** related to regulatory compliance to avoid their reoccurrence.

3. DEFINITIONS

Site

In the context of this procedure, Site is taken to mean the LCPL Site, the Raw Water Pumping Station, and the adjacent 50 Acre Plot.

Accident

Consequence of an unplanned event / incident, the consequence can be injury, illness, harm to the environment, property damage, all or none. (See Appendix-1)

It's includes

- **Event / Incidents** causing work related injuries, occupational illnesses and incidents with the potential for harm to LCPL employees and contractors hired by LCPL.
- **Event / Incidents** causing, or with potential to cause, harm to a member of the public or complaints from the public
- **Event / Incidents** causing, or with the potential to cause, damage to plant, material or the environment
- **Event / Incidents** causing, or with the potential to cause, harm to LCPL employees whilst travelling on company business
- Harm as a result of a security incident (e.g. deliberate product contamination).

Accidents & Significance Incidents are categorized in **Appendix-1 & Appendix-6** respectively.

Significant Incidents

These incidents will have:

- a significant personal injury or damage to property,
- a serious malfunction of plant or process,
- National media interest or public involvement,
- major contamination of the environment.

4. REQUIREMENTS

All **Accident** shall be raised using Incident Reporting Database on **IBM** Notes. **HR & IT** Manager shall be responsible for providing access to this Database to all PC holders on Network.

Training on **Accident** Reporting Database shall be provided by **HR & IT** Manager.

Overhaul Manager shall specify **Accident** Reporting Procedure during Overhaul in Safe System of Work document which shall be on the same **Accident** Reporting Database as far as reasonably practicable.

Any individual reporting the **Accident** shall open and click “Create Menu” on the database and select the type of Incident or Complaint to be reported which will open the format to be completed.

All **Accident**, injuries and Complaints shall be discussed briefly in each Morning Meeting to assign actions for investigation. Except for the formal investigations respective Sectional Heads shall lead the investigations involving HSE & **Technical Training** Manager if required.

Assistant Manager QHSE shall report following data in Location HSE&S Committee meeting and HSE & **Technical Training** Manager shall report following data to Business HSE Committees covering:

- Injuries and Occupational Health data
- Environmental Data
- **Motor Vehicle & Distribution Incidents**
- **Significant Incidents**
- **Security Incidents**

The line manager shall establish and monitor key performance indicators (KPI's) that should include the performance data on safety and environment as well as indicators that assess the effectiveness of the HSE&S Management system according to business needs.

Line managers to ensure monitoring systems are defined that include:

- Performance criteria or acceptable standards
- Frequency and responsibility for monitoring (Appendix-4)
- Requirement for analysis, trending and management review, and communication of results.
- Procedure for correcting actual or potential failures of performance or of the management system.

Any person seeing, or who is first on the scene, or is involved in an injury incident at Site where help is required shall:

- Notify the **Main Control Room** by **dialing site emergency number** (Ext 2222) site hotline number (021-34726029) from RWPS giving details of the Emergency.
- In case of Emergency at Co-Gen plant, notify the Co-Gen Control Room by **dialing Co-Gen Control Room number** (Ext: 2601).
- Plant based personnel may use the radio, in-plant public address system or report in person whereas RWPS based personnel may use the Radio.

Boardman / Assistant Engineer Process / Assistant Manager Process receiving details of the emergency shall:

- immediately raise emergency call and report the details to the appropriate Shift Manager or Senior Shift Manager.

Functional Heads (Appendix-6)

The relevant Functional Head shall:

- Ensure that all **significant incidents** are formally investigated and reports **are** issued. Functional heads shall also write their comments on the formal investigation reports before final issue.

Department Managers

The relevant Department Managers shall:

- Ensure that all **accidents** and complaints are promptly investigated to identify their root causes and develop actions to prevent recurrence for implementation. These actions shall be appropriate to the actual or potential consequence of the incidents (Appendix-2).
- Ensure formal investigation of all injuries more severe than minor, category C & D environmental incidents, category III & IV HSE complaints, all reportable distribution incidents, all fires & explosion incidents and any other incident which concerned department manager feels requires formal investigation. HSE & **Technical Training** Manager shall be part of these investigation committees.
- Implement recommendations from **Accident** investigations.
- **Security incidents** (e.g., loss of product containment) will be formally investigated by **General Affairs & Security Manager** as per Pakistan Criminal Code 1997. (Ref. 7.5)
- Ensure that an appropriate team is nominated to carry out the formal investigation depending upon the nature of the incident. In this regard **Department Managers** shall consult **General Manager Manufacturing** for advice and consent.

The degree of investigation will depend on the severity, or potential severity, of the **Accident**. Minor **Accident** may only require an informal discussion by work colleagues and verbal communication at team meetings. Other may require a simple investigation, whilst some will require a formal in-house investigation with a committee and report (Appendix-5). **Model for a formal incident investigation report is attached in Appendix-3.**

Causes and actions arising from investigation of all **Accident** and complaints shall be reviewed in Monday Communication Meeting. The relevant department / section managers shall cascade the information down to shop floor level.

Concerned Manager shall immediately inform the respective Functional Head of all reportable **Significant Incidence**. The Functional Head shall share the information and actions with the Chief Executive, **General Manager Manufacturing, HSE & Technical Training** Manager and / or other appropriate managers & board members as appropriate.

HSE & **Technical Training** Manager shall:

- Maintain all HSE statistics and records and be responsible for reporting these to Business & Location HSE Committees.
- Be responsible for maintaining the **Accident** Log. Monitor completion of all actions arising from formal investigations.
- Present incidents and learning on weekly basis in Monday communication meeting for cascading.

The **General Manager HR & IT** shall report injuries to regulatory authorities as per Factories Act 1934. He shall liaise with external agencies like Police, District Authorities etc wherever required.

City Office HSE nominees will ensure that all their **Accident logs** are reported through LCPL database.

If any of the following **Accident** occur then concerned manager shall immediately inform the respective Functional Heads or nominee. The Functional Head or nominee shall inform the Chief Executive and **General Manager Manufacturing** immediately.

1. An accident involving an employee or contractor that is or may become a Lost Time Case or a Restricted Work Case.
2. A distribution incident in which anyone is injured, any product spillage occurs, or traffic flow is held up in significant degree.
3. A crime is committed in which an employee or employee's immediate family is under threat.
4. A fire or environmental incident at a plant that affects neighbors or could be reported in the media.
5. A plant breakdown or lack of raw material that will lead to loss of production for more than 24 hours or inability to meet a monthly target.

6. Failure to supply material to a customer per promise such that customer's operations are significantly affected.

5. COMMUNICATIONS AND TRAINING

All line managers shall receive training on this procedure from the HSE & [Technical Training](#) Manager.

All first line managers shall receive training on this procedure from their line Managers.

First line managers shall train all non-management staff on this procedure.

All LCPL personnel will be encouraged to report all accidents including learning events as part of their induction training.

All contractors shall be communicated the HSE&S reporting requirements of this procedure as part of their induction training package.

6. DOCUMENTATION

Appendix-1 [Accidents Categorization](#)

Appendix-2 Guidelines for Formal Investigations

Appendix-3 Model for a Formal [Accident](#) Investigation Report

Appendix-4 Guidelines for [HSE Performance Evaluation](#)

Appendix-5 Investigation [Protocol](#)

Appendix-6 Functional Heads

7. REFERENCES

[SHE-003B Section 1](#)

[SHE-003B Section 2](#)

[SHE-003B Section 3a](#)

[SHE-003B Section 4](#)

[Pakistan Criminal Code 1997](#)

8. AMENDMENTS

This is the [seventh](#) revision.