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Dr John Dal Santo, FACBS  
MCJ Inc.  
Manufacturers of EyeCheck Instrumentation.

Dear John

**Re Successful Use of EyeCheck Technology in CSR Sugar**

Thank you for your support through the successful introduction of 'Fit for Duty' processes in CSR Sugar since 2003. The use of the non-invasive EyeCheck pupillometry for first screen impairment detection, including fatigue, has been a cornerstone of our approach.

A summary of the work undertaken follows,

Yours truly,

A handwritten signature in black ink that reads 'M. J. Boyle'. The signature is written in a cursive style with a large, sweeping 'L' at the end.



## **The Development of a Fit for Duty Process using EyeCheck Technology in CSR Sugar**

At CSR Sugar, we are committed and determined to have a workplace where nobody gets hurt. Further under Queensland State legislation a general duty of care obligation to employees and the general public exists. In 2002 we recognised that these values and obligations required the introduction of formal processes to ensure that people are Fit for Duty (FFD) at CSR Sugar sites. Our operations employ 1700 employees in multiple Queensland locations, they include seven Sugar Mills, an Ethanol Distillery, and thousands of kilometres of tramways running over 80 locomotives around the clock during the six month crushing season.

Throughout 2003 an innovative process for effective FFD management was developed. This involved wide consultation and extensive trials of the EyeCheck impairment screening technology using internal operators and the development of a group of internal leaders to champion the process. The trials were successful and our Fit for Duty process has been in place since July 2004.

The CSR Sugar process formalises existing line manger responsibilities and uses a two screen impairment detection process that incorporates pupillometry technology (EyeCheck) supported by more established alcoholometer and urine screening. The process also uses the EyeCheck instrument's ability to screen for fatigue.

During trial work over 1500 EyeCheck screens were completed and during implementation, fifty five CSR Sugar Workgroups were selected with a total of 539 people invited to undergo screening. With a credible and efficient process now fully established in our business, we intend to screen 150 people per month for the next 12 months and further deployment in other CSR divisions is likely.

Our approach when the first screen EyeCheck Instrument indicates impairment (either through fatigue or alcohol & other drugs) is to state that the instrument has measured an eye response that is typical of someone who is impaired, no definitive statement of impairment is made at this stage. The employee is then invited undergo further confirmatory screening i.e. alcohol or urine screening or to undertake a validating fatigue questionnaire. Any refusal to continue requires the employee to leave the workplace and our requirement is that they must screen as unimpaired before returning to work. While there have been some issues with employees with eye conditions or on medication who constantly fail EyeCheck, these are managed within our two step process. Essentially EyeCheck appears to failsafe and in a number of cases following a screening fail employees have chosen to discuss medication levels with their Doctor. During the initial screening trial, we were concerned with the relatively high number of fatigue failures (initially approaching 30%), however subsequent screening saw this number ratio drop to around 10% through improved operator technique



and screened employee familiarisation. Also the development of a second screen validating questionnaire along with a range of practical options to manage fatigue demonstrates that we are meeting our obligations in managing this difficult area.

### **Key elements of the CSR Sugar Fit for Duty Process**

We believe that the introduction of a formal FFD process in our business has lowered the possibility of people being hurt through changing existing patterns of behaviour. Key elements of our process are:

- It manages situations at work where a person may be impaired through fatigue, emotional distress, illness or the effects of alcohol or other drugs.
- It applies to all employees, contractors and visitors on QLD CSR Sugar sites.
- The process uses a non-invasive first screen instrument (EyeCheck)
- The process is overviewed by a Fit for Duty (Impairment) Steering Group comprising of union members, management representatives and skilled operators.
- The FFD process applies in the following areas; supervisor interface, unannounced random workgroup impairment screening, 'For Cause' testing and pre-employment alcohol and other drugs screening.

From our CSR Sugar Safety Health & Environment Procedure SHE-SP-083 - Fit for Duty (Impairment)

*The processes outlined in this group procedure and associated documents are based on prevention, support and shared responsibility. They were developed by a joint working group representing all CSR Sugar stakeholders; business cells, unions, (AWU, AMWU & ETU) the CSROA, OHS professionals and management. Development work included input from external experts, broad consultation and an extensive two stage internal trial of an impairment detection instrument. Overall the designed process seeks to balance the privacy rights of individuals with broader business OHS legal obligations. It is accepted by all stakeholders that the FFD process will continue to evolve and improve. This procedure applies equally to all people at CSR Sugar sites and offices. It outlines the shared responsibilities and accountabilities for managing Fit for Duty (Impairment) issues. It outlines the mechanisms that shall be used to ensure that employees who are impaired do not compromise the health and safety of either themselves or any other person.....*

AND



*The Objectives of this Procedure are to*

- 1. Influence individual behaviour so that all CSR Sugar employees, contractors and visitors present at work in a state where they are unimpaired.*
- 2. Ensure that no person is injured at CSR Sugar sites as a result of impaired judgement, alertness or physical coordination.*
- 3. Ensure that no other loss; e.g. environmental ill effects, equipment damage or process loss occurs at CSR Sugar sites as a result of impaired judgement, alertness or physical coordination.*
- 4. Ensure that all employees, contractors and visitors to CSR Sugar Sites remain fit for duty (unimpaired) while they are at work.*
- 5. Clearly define the behaviours expected of all CSR Sugar employees, contractors and visitors.*
- 6. Define mechanisms that will be used to assess if people are Fit for Duty.*
- 7. Provide mechanisms for employee consultation both before and during procedure implementation and also during subsequent process improvements.*
- 8. Discourage the inappropriate use of alcohol and other drugs, support responsible usage and provide assistance where problems exist.*
- 9. Ensure that risks and hazards present when people are fatigued, are both recognised and managed*

### **The Role of the EyeCheck Technology.**

We believe that adopting EyeCheck technology has enabled us to implement a credible, effective, low cost Fit for Duty management process. The ability of the instrument to detect eye responses that are typical of either intoxication or fatigue has been a major part of this successful work.

Mike Boyle

January 2005.