

SafeWork NSW



9 October 2025

ENFORCEABLE UNDERTAKING

Part 11

Work Health and Safety Act 2011

The commitments in this enforceable undertaking
are given by

Westrock Oceania Pty Limited

ACN: 000 592 745

to SafeWork NSW and accepted by SafeWork NSW

Privacy statement

SafeWork NSW respects your privacy and is committed to protecting personal information. The information provided on this document is for the purpose of making an undertaking to SafeWork NSW given for the purposes of part 11 of the WHS Act. This information will be managed within the requirements of the current state government privacy regime.

SafeWork NSW may publish the undertaking, and the information contained in it for purposes identified in the undertaking or for other appropriate legal purposes in various publications such as newspapers and on its website. SafeWork NSW may be required to disclose personal information to other regulatory agencies in accordance with other law enforcement activities which may be conducted as part of an investigation. Further information on our privacy policy is available at safework.nsw.gov.au.

Purpose

The purpose of this enforceable undertaking is to document the undertakings given to SafeWork NSW and accepted by SafeWork NSW pursuant to Part 11 of the Work Health and Safety Act 2011 (NSW) (**WHS Act**) in connection with matters relating to alleged contraventions of the WHS Act or the Work Health and Safety Regulation 2017 (NSW) (**the Regulations**). The Agreed Terms of the Enforceable Undertaking are set out below.

Section 1 – General information

a. Details of the person giving the undertaking

Entity Name:	Westrock Oceania Pty Limited
ACN:	000 592 745
Registered Address:	8 Bells Line of Road North Richmond NSW 2754
Postal address:	8 Bells Line of Road North Richmond NSW 2754
Telephone contact:	[REDACTED]
Email address:	[REDACTED]@smurfitwestrock.com
Legal structure:	Propriety limited company
Type of business:	Paperboard Packaging Manufacturer
Commencement date of the entity:	1 December 2017
Number of workers:	Full-time: 221 Part-time: 4 Casual: 31
Products and/or services:	Beverage, food and pharmaceutical consumer packaging

b. Commencement

This Undertaking comes into effect when:

- i. The Undertaking is executed by Westrock Oceania Pty Limited;
- ii. SafeWork NSW accepts the executed Undertaking (**Commencement Date**).

c. Duration

- i. Section 5 identifies timeframes for the completion of each strategy identified in this enforceable undertaking;

- ii. The enforceable undertaking will be concluded on written advice from SafeWork NSW to Westrock Oceania Pty Limited when all requirements of the undertaking have been satisfactorily executed.

Section 2 – The alleged contravention

a. Details of the alleged contravention

It is alleged by SafeWork NSW that on 2 July 2022, Westrock Oceania Pty Limited failed to discharge its obligations as a person conducting a business or undertaking under section 19(1) and section 32 of the WHS Act in that it did not ensure so far as reasonably practicable the health and safety of workers and/or others.

b. Details of the events surrounding the alleged contravention

At approximately 4.30pm, 2nd July 2022, a Sheeter Operator had their left hand caught and drawn in-between two rollers on the Sheeter Machine 1 whilst it was in operation. The worker was able to stop the machine via a sensor, however their hand remained trapped within the rollers.

First aid and support were immediately provided, and the emergency services extricated the worker.

c. The details of any injury that arose from the alleged contravention

The injured worker sustained a traumatic crush injury to their left hand which required multiple surgeries.

d. An acknowledgement that SafeWork NSW alleged a contravention has occurred

It is acknowledged by Westrock Oceania Pty Limited that SafeWork NSW has alleged that Westrock Oceania Pty Limited has contravened sections 19(1) and 32 of the WHS Act.

e. A statement of regret that the incident occurred

Westrock Oceania Pty Limited sincerely regrets that the incident on 2 July 2022 occurred and extends its sympathy to the injured worker, their family, Westrock Oceania Pty Limited workers and any others who have been affected by the incident. Westrock Oceania Pty Limited is committed to ensuring, as far as is reasonably practicable, the ongoing health and safety of its workers and other persons.

f. Prior work health and safety convictions

Westrock Oceania Pty Limited has had no prior work health and safety convictions in NSW or other work health safety jurisdictions.

g. The details of the type of workers compensation provided

The injured worker was provided with [REDACTED] and access to financial assistance through the workers compensation scheme.

- h. The details of the support provided, and proposed to be provided, to the injured person(s) to overcome the injury/illness



Section 3 – Enforcement Notices and Rectifications

- a. The details of any enforcement notices issued that relate to the alleged contravention

Date issued	Notice type	Notice number	Contravention	Action taken in response to notice
22/07/2022	Prohibition Ref 7-422521	7-317- NJM8CF	Section 19 (WHS Act), clause 203 (WHS Reg)	Table interlocked guard installed on Sheeter 1.
22/07/2022	Prohibition Ref 7-422522	7-317- E167ZM	Section 19 (WHS Act), clause 203 (WHS Reg)	Table interlocked guard installed on Sheeter 2.

- b. Any rectifications or changes made to work health and safety systems and/or practices as a result of the alleged contravention

Description	\$ Amount
Sheeter 1 table deck conveyor guarding review and upgrade to the deck guard. Employee competency assessment verification.	75,000
Sheeter 2 table deck conveyor guarding review and upgrade to the deck guard. Employee competency assessment verification.	75,000

TOTAL AMOUNT SPENT ON RECTIFICATIONS

\$150,000

Section 4 – Statements, commitments, and acknowledgements

- a. A commitment that the behaviour that led to the alleged contravention has ceased and will not reoccur

Westrock Oceania Pty Limited commits that the behaviour that led to the alleged contravention has ceased and that it will take all reasonably practicable steps to prevent recurrence of this type of incident.

- b. A statement of assurance about future work health and safety behaviour

Westrock Oceania Pty Limited is committed to complying with its obligations under the WHS Act and ensuring, so far as reasonably practicable, the health and safety of all workers and those who may be affected by its business or undertakings.

- c. A commitment to the ongoing effective management of work health and safety risks

Westrock Oceania Pty Limited commits that it will, so far as reasonably practicable, maintain ongoing effective management of work health and safety risks.

d. An acknowledgement that the enforceable undertaking will be published and publicized

Westrock Oceania Pty Limited acknowledges that the enforceable undertaking will be published on SafeWork NSW's internet site until the completion of the enforceable terms and may be referenced in SafeWork NSW's publications.

e. A statement of ability to comply with the terms of the enforceable undertaking

Westrock Oceania Pty Limited acknowledges that it has the financial ability to comply with the terms of this enforceable undertaking and has provided evidence with this undertaking to support this declaration.

f. An acknowledgement consultation has occurred within the workplace regarding the proposal of an enforceable undertaking

Westrock Oceania Pty Limited acknowledges that it has a duty to consult within the workplace in relation to the development of the enforceable undertaking proposal, including consultation with various work groups such as the WHS Committee Meeting 6th May 2025, Flat Work Toolbox Talk on the 6th May and site wide Town Hall 3rd and 4th of July 2025.

g. Intellectual property licence

Westrock Oceania Pty Limited grants SafeWork NSW a permanent, irrevocable, royalty-free, worldwide, non-exclusive license to use, reproduce, distribute, electronically transmit, electronically distribute, adapt, and modify any materials developed as a result of this enforceable undertaking. This is subject to any intellectual property licence or restrictions imposed by third party providers used during the delivery of the enforcement undertaking by Westrock Oceania Pty Limited.

h. A commitment to participate constructively in all compliance monitoring activities of the undertaking

Westrock Oceania Pty Limited acknowledges that the responsibility for demonstrating compliance with this undertaking rests with Westrock Oceania Pty Limited. Evidence to demonstrate compliance with the terms will be provided to SafeWork NSW by the due date for each Strategy item identified in Section 5.

Westrock Oceania Pty Limited acknowledges that SafeWork NSW may undertake other compliance monitoring activities to verify the evidence that is provided for each Strategy item identified in Section 5. The evidence provided to demonstrate compliance with the undertaking will be retained by Westrock Oceania Pty Limited until advised by SafeWork NSW that the undertaking has been completely discharged.

Westrock Oceania Pty Limited acknowledges that SafeWork NSW may initiate additional compliance monitoring activities, such as inspections, as considered necessary.

Westrock Oceania Pty Limited acknowledges that should there be any delay in the delivery or compliance of the Enforceable Undertaking this will be subject to mutual agreement (confirmed in writing) between Westrock Oceania Pty Limited and SafeWork NSW.

i. A commitment regarding linking the strategy and promotion of benefits to the enforceable undertaking

Westrock Oceania Pty Limited is committed to ensuring that any real or perceived promotion of a benefit arising from this enforceable undertaking will clearly link the benefit to the enforceable undertaking and that the enforceable undertaking was entered into as a result of the alleged contravention identified in section 2 above.

Where products or other deliverables are externally promoted or have a direct link to the enforceable undertaking Westrock Oceania Pty Limited will include the following statement:

This Enforceable Undertaking into Flat Work Automation has been produced as part of an enforceable undertaking between Westrock Oceania Pty Limited, ACN: 000 592 745, and SafeWork NSW.

Any variation to the above statement requires prior written agreement between Westrock Oceania Pty Limited and SafeWork NSW.

j. A commitment to gain review and approval for industry and/or community safety information

Westrock Oceania Pty Limited commits that any strategies to be implemented by Westrock Oceania Pty Limited in compliance with this Enforceable Undertaking that involve safety information being provided to the industry and/or community will be subject to SafeWork NSW's review and approval of the content prior to dissemination.

k. Inconsistent Statements

Westrock Oceania Pty Limited commits that it will not make any statement or otherwise imply anything that is inconsistent with the statements, commitments or acknowledgements contained in this Undertaking and will take steps to ensure its representatives, employees and officers do not make any such statements.

l. Reliance on Commitments

Westrock Oceania Pty Limited acknowledges that SafeWork NSW may rely upon the commitments and statements set out in Section 4 (a), (b) and (c) above when making decisions regarding enforcement action if Westrock Oceania Pty Limited fails to comply with its work health and safety obligations in the future, including but not limited to any failure to comply with its obligations under this Undertaking.

m. Withdrawal or variation

Westrock Oceania Pty Limited may with the written agreement of SafeWork NSW withdraw or vary the undertaking in accordance with section 221 of the Work Health and Safety Act 2011.

n. Acknowledgement of Enforceable Undertakings Guidelines and Contravention of the Undertaking

Westrock Oceania Pty Limited has read and understood SafeWork NSW Enforceable Undertakings Guidelines.

Westrock Oceania Pty Limited acknowledges that if Westrock Oceania Pty Limited contravenes any of the terms of this Enforceable Undertaking, SafeWork NSW may apply to the District Court for an order in accordance with section 220 of the Work Health and Safety Act 2011.

Section 5 – Strategies

Westrock Oceania Pty Limited undertakes to deliver the following Strategies.

Each strategy in the enforceable undertaking aims to provide lasting work health and safety benefits across the workplace, the industry, and the community, or a combination of these.

Strategies that relate to the dissemination of information in relation to the enforceable undertaking

Strategy 1 – Enforceable undertaking public notice

Summary:

Westrock Oceania Pty Limited will place a public notice advising of the enforceable undertaking with SafeWork NSW.

WHS outcome and beneficiaries:

The public notice serves to advise the general public about the enforceable undertaking and serves as a form of both education and deterrence for industry.

Strategy delivery and verification:

The strategy will be delivered and verified by SafeWork NSW in accordance with the table below.

How is it occurring	When will it happen	Position Title(s) or Area responsible and/or involved	Evidence that will be provided to SafeWork NSW
Using the script provided in Annexure 1 a public notice will be published in the Intermedia ProPrint.Pro magazine (a bi-monthly Australian printing industry magazine) The script for the notice must be approved by SafeWork NSW prior to the public notice being published. Failure to adhere to these conditions may result in SafeWork NSW requesting another public notice be published.	Within 30 days of the Commencement Date of the enforceable undertaking, or when the first available edition of the Intermedia ProPrint.Pro magazine is published, but not prior to SafeWork NSW publishing a copy of the enforceable undertaking.	Westrock Oceania Pty Limited General Manager, Consumer Packaging, Pacific.	Within 7 days of placing the published notice Westrock Oceania Pty Limited will provide SafeWork NSW with a copy of the public notice printed in the Intermedia ProPrint.Pro magazine.

Strategy 2 – Dissemination of information about the enforceable undertaking

Summary:

Westrock Oceania Pty Limited agrees to disseminate information about the enforceable undertaking with SafeWork NSW within its workplace including its workers, the members of any health and safety

committee, health and safety representatives and all subcontractors working for Westrock Oceania Pty Limited and to any other relevant parties.

WHS outcome and beneficiaries:

The dissemination of information about the enforceable undertaking is an important step in maintaining effective dialogue with the workforce about the enforceable undertaking and safety more broadly.

Strategy delivery and verification:

The strategy will be delivered and verified by SafeWork NSW in accordance with the table below.

How is it occurring	When will it happen	Position Title(s) or Area responsible and/or involved	Evidence that will be provided to SafeWork NSW
1. Communications via POKA the site's internal media connected worker platform for Westrock Oceania Pty Limited.	Within 14 days of the Commencement Date of the enforceable undertaking.	General Manager, Consumer Packaging, Pacific.	PDF copy of the POKA post noting the date and time of the post.
2. Publish details of the enforceable undertaking in Westrock APAC internal newsletter. We will also submit a Safety Bulletin that will be shared within Westrock APAC.	Within 45 days of the commencement of the enforceable undertaking.	General Manager, Consumer Packaging, Pacific.	<ul style="list-style-type: none"> • Copy of the Westrock APAC internal newsletter showing the article relating to the enforceable undertaking noting the date and time of the newsletter. • Copy of the Safety Bulletin and evidence of distribution to Westrock APAC noting the date and time of the safety bulletin.

Strategies that will deliver benefits to the workplace, industry and the community

Strategy 3 - Flat work automation

Summary: Proposal

The proposed Flat Work Automation project outlined in this Enforceable Undertaking by Westrock Oceania Pty Limited consists of the installation of a fully automated robotic cell with infeed/outfeed conveyor in the Flat Work Area.

Process Description

The function of this process is to transfer the Finished Goods from internal production related Work in Progress (WIP) pallets to the larger Finished Goods logistics pallets (CHEP, Loscam) to meet the pallet packing and configuration requirements outlined within the National Heavy Vehicle Chain of Responsibility regulations.

Nature of the Problem

The current issue with this area is that the work is highly labour intensive, consisting of hazardous repetitive manual handling which exposes the workers to the risk of musculoskeletal disorders.

There is also a large amount of forklift and Powered Industrial Truck (PIT) movements within this area, moving internal WIP pallets and larger Finished Goods pallets once packing has been completed. As the process is highly labour intensive, the area is at increased risk of PIT interaction with employees. While line marking, barricades and restricted zone limit some of this interaction, the proposed automation would significantly reduce the use of PIT's and reduce the number of people in this area.

Benefits to the Print Community

Automation of Flat Work Finished Goods within the Print & Media Industry is in its early stages of implementation internationally and would be at the forefront of development in Australia.

The specialty automation that makes this project unique is the challenge of programming robotic code to facilitate the handling and stacking of a wide variety of Finished Goods and their stacking variations on to a CHEP/ Loscam pallet. Currently Westrock Oceania Pty Limited has over 150 unique flatwork design shapes that require handling and repacking. The intelligence of robotics to handle this level of unique designs would be, to our knowledge, the first of its kind in Australia.

Deliverables

This project will significantly reduce the amount of hazardous manual handling and interactions between people and PITs from the Flat Work production process.

WHS outcome and beneficiaries:

The reduction of hazardous manual handling will reduce the risk exposure of musculoskeletal injuries to our Finishing workforce and lead to the reduction of lost time injury workers compensation claims. The reduction in the number of interactions between people and PITs further reduces the risk of injury to workers due to such interactions.

As a result of this strategy WHS benefits are expected in the:

- ✓ Workplace
- ✓ Industry
- ✓ Community

Strategy delivery and verification:

The strategy will be delivered and verified by SafeWork NSW in accordance with the below.

What is happening (Option 1)	How is it occurring	When will it happen	Position Title(s) or Area responsible and/or involved	Evidence that will be provided to SafeWork NSW
<p>FLAT-WORK AUTOMATION PROJECT Hazardous Manual Handling: Flat Work throughout the printing industry in Australia is a manual process. In Europe this process is starting to be automated with the use of industrial robots. Engage an automation specialist to design a fit for purpose industrial robot to process Flat Work.</p>	<p>Westrock Oceania Pty Limited to engage third-party automation company to design, install, commission, provide instruction and training on an automated cutting edge robotic Flat Work solution.</p>	<p>Engagement of third-party automation company within 2 months of the commencement date of the enforceable undertaking.</p>	<p>Manufacturing Manager.</p>	<p>Copy of proof of engagement of automation company outlining the scope of the project.</p>
<p>DESIGN CONCEPTS</p>	<p>Automation company to provide up to date design drawings for proposed Flat Work automated cutting edge robotic Flat Work solution.</p>	<p>Within 20 weeks of placement of Commencement date of the enforceable undertaking.</p>	<p>Manufacturing Manager.</p>	<ul style="list-style-type: none"> • Up to date design drawings of the automation system.

<p>RISK ASSESSMENT & CONSULTATION Preliminary risk assessments based on design drawings.</p>	<p>Westrock Oceania Pty Limited to conduct a preliminary risk assessment in consultation with its workers based on the design drawings provided by automation company and provide any feedback required to automation supplier.</p> <p>A third-party Machine Safety Engineer/Auditor will be engaged to assist Westrock conduct the risk assessment.</p> <p>The risk assessments will consider any foreseeable risks/hazards that the installation, commissioning and operating processes may create.</p>	<p>Within 26 weeks of Commencement date of the enforceable undertaking.</p>	<p>Manufacturing Manager.</p>	<ul style="list-style-type: none"> • Copy of risk assessment completed • Copy of risk assessment meeting minutes or any other record of consultation with workers during risk assessment process. • Copy of feedback on design drawings to automation supplier. • Copy of proof of engagement or paid invoice for third-party Machine Safety Engineer/Auditor and evidence of their engagement in risk assessment process.
<p>CONSIGNMENT AND SUPPLY</p>	<p>Automation supplier to ship Flat Work Automation plant components.</p>	<p>Within 78 weeks Commencement date of the enforceable undertaking.</p>	<p>Manufacturing Manager.</p>	<ul style="list-style-type: none"> • Confirmation to SafeWork NSW of supply or updates if any delays occur in shipping.
<p>INSTALLATION</p>	<p>Automation supplier to provide technical engineer to assemble and install Flat Work Automation plant in accordance with manufacturer's instructions and agreed Westrock procedures.</p> <p>Westrock will engage the same third-party Machine Safety Engineer/Auditor used at the risk assessment stage to oversee the installation and commissioning of the Flat Work Automation to ensure identified risks are adequately managed.</p>	<p>Within 102 weeks Commencement date of the enforceable undertaking.</p>	<p>Manufacturing Manager.</p>	<ul style="list-style-type: none"> • Site visit by SafeWork NSW and/or photo evidence of installed equipment. • Copy of proof of engagement or paid invoice for third-party Machine Safety Engineer/Auditor involvement in installation & commissioning, including confirmation from Safety Engineer/Auditor that all identified risks have been controlled.
<p>COMMISSIONING</p>	<p>Automation supplier technical engineer commissions Flat Work Automation correcting plant</p>	<p>Within 126 weeks of Commencement date of</p>	<p>Maintenance Manager. Area Leader.</p>	<ul style="list-style-type: none"> • Copy of Risk Assessment completed on commissioning.

	<p>calibration issues in accordance with manufacturer's instructions and agreed Westrock procedures.</p> <p>Automation supplier technician provides written manufacturer's instructions and trains operators and maintenance teams.</p>	the enforceable undertaking.		<ul style="list-style-type: none"> • Training Records indicating date, time, topics covered and records of attendance.
<p>SOFT CONTROLS Westrock Oceania Pty Limited develops Safe Operating Procedures (SOP) and train all employees that would operate this equipment.</p>	<p>Develop SOPs and conduct SOP sign off.</p> <p>The SOPs will include any identified hazards/risks and controls associated with the operation of the Flat Work Automation solution and any associated processes.</p> <p>Training of staff in SOP.</p>	During installation and commissioning phase.	Area Leader & Safety Manager.	<ul style="list-style-type: none"> • Copy of SOP for Flat Work robotic solution. • Training records indicating date, time, topics covered and records of attendees.

Cost:

Description	\$ Amount
FLAT-WORK AUTOMATION PROJECT	
Slab preparation	██████
Electrical	██████
WiFi integration	██████
Robotic cell	██████
Project Cost & FAT	██████
Safety signage	██████
Pedestrian line marking & guard railing	██████
Promotional media	██████
Training - Robot control panel operation	██████
Cost of third-party Machine Safety Engineer/Auditor	██████

Total estimated costs	1,790,000
Project cost attributed to safety - 50%	895,000

Strategy 4 – Targeted audit strategy – Machinery and guarding

Summary:

In response to the incident that is the subject of the enforceable undertaking, Westrock Oceania Pty Limited engaged a third-party Machine Safety Engineer/Auditor to complete a full review of the safety of machinery (guarding, interlocks, presence sensing systems and human machine interaction) at the North Richmond site.

Westrock Oceania Pty Limited is committed to undertaking a follow up audit (comprising an audit of each commissioned sheeter in operation). The follow up audit would be completed within 12 months after commencement of the enforceable undertaking.

WHS outcome and beneficiaries:

A third-party audit/review will provide Westrock Oceania Pty Limited and its workforce with further reassurance that risks related to the sheeters are being effectively identified and actioned based on risk prioritisation.

As a result of this strategy WHS benefits are expected in the:

- ✓ Workplace
- ✓ Industry
- Community

Strategy delivery and verification:

The strategy will be delivered and verified by SafeWork NSW in accordance with the table below.

What is happening	How is it occurring	When will it happen	Position Title(s) or Area responsible and/or involved	Evidence that will be provided to SafeWork NSW
Engage a suitable third-party plant and Machinery Safety Engineer/Auditor.	Westrock to identify a suitable plant and Machine Safety Engineer/Auditor.	Within 2 months of commencement of the enforceable undertaking.	Manufacturing Manager.	Evidence of auditor engaged including the relevant qualifications of the Machine Safety Engineer/Auditor.
Machine Safety Engineer/Auditor	Machine Safety Engineer/Auditor to attend Westrock's premises to conduct audit on commissioned sheeters and	Within 6 months of the engagement of the third-	Third party Machine Safety Engineer/Auditor.	Copy of follow up audit findings certified by the auditor as an unaltered copy of the original.

to conduct follow up audit.	prepare a report detailing their findings and recommendations.	party Machine Safety Engineer/Auditor.		
Develop and implement action plan based on auditors' findings.	Review audit of sheeters findings and create action plan to implement changes required. Action plan will list each required actions, who is responsible, and due dates. Westrock's intention is to implement all of the actions identified in the audit unless otherwise agreed with SafeWork NSW.	Within 6 months of receiving the final audit report from the third-party Machine Safety Engineer/Auditor.	Manufacturing Manager.	Copy of action plan based on findings. Updated action plan with completion dates marked for each item.

Costs:

Description	\$ Amount
Cost of external auditor and implementation of audit actions	\$130,000
Total estimated costs	\$130,000

Strategy 5 – Industry strategy – sharing lessons and safety improvements with industry

Summary:

Westrock Oceania Pty Limited is committed to sharing its own experience with the wider Print & Packaging industry to help ensure the safety of workers and prevent further workplace industries. This strategy includes:

- the development of a case study sharing the safety successes of the machine safety project completed as part of Strategy 3 of this enforceable undertaking
- promotion of such a case to industry
- Articles printed in the Intermedia ProPrintPro magazine.

As a result of this strategy WHS benefits are expected in the:

- ✓ Industry
- ✓ Community

Strategy delivery and verification:

The strategy will be delivered and verified by SafeWork NSW in accordance with the table below.

What is happening	How is it occurring	When will it happen	Position Title(s) or Area responsible and/or involved	Evidence that will be provided to SafeWork NSW
Sharing WHS lessons learnt and successes with industry through the development of a case study.	<p>Westrock Oceania Pty Limited will develop and produce a short (up to 5 min) video case study. The case study will highlight the original incident that led to the EU and a driver to improve safety, the WHS and other benefits the Flat Work Automation project has provided to the workforce. It will highlight the project aims (in a WHS context), the key steps in delivery including consultation with workers, and the WHS outcomes achieved.</p> <p>The production of the video will include:</p> <p>1) The development of a draft script that will be provided to</p>	<p>1) Within 1 month of commissioning of</p>	EHS Manager.	<ul style="list-style-type: none"> • Copies of the draft script provided to SafeWork NSW for review and approval. • Copy of the contract or accepted quote from the videographer to produce the case study video. • Draft copy of the case study video for SafeWork NSW to review and provide approval prior to finalising. • Final case study video including video and audio files.

	<p>SafeWork NSW to review and provide comment on.</p> <p>2) The engagement of a videographer to produce the video.</p> <p>3) Draft copies of the video will be provided to SafeWork NSW for review and comment before being finalised.</p> <p>4) The production of a final case study video.</p>	<p>the Flat Work Automation.</p> <p>2) Within 1 month of commissioning of the Flat Work Automation.</p> <p>3) Within 4 months of commissioning of the Flat Work Automation.</p> <p>4) Within 6 months of commissioning of the Flat Work Automation</p>		
Promotion of the case study.	<p>The video will be promoted to industry through meetings, events and or communications via the following channels:</p> <ul style="list-style-type: none"> Articles printed in the Intermedia ProPrintPro magazine. A communication to Westrock clients. A presentation at an industry conference, expected to be the [REDACTED] (if the conference is still occurring at that time). Providing the case study to other industry bodies including [REDACTED] 	<p>Within 7 months of commissioning of the Flat Work Automation.</p>	EHS Manager	<p>Evidence of promotion of the case study:</p> <ul style="list-style-type: none"> Copy of article promoting the case study printed in the first possible ProPrintPro magazine edition after the final case study video is produced. Copy of communication to Westrock clients. Evidence of engagement with [REDACTED] to present at the first possible [REDACTED] after the case study video is produced, and, evidence of the presentation being delivered (if applicable). Evidence of sharing the case study with [REDACTED].

Costs:

Description	\$ Amount
Promotion of case study to Industry Associations	20,000
Total estimated costs	\$20,000

TOTAL ESTIMATED COSTS OF ENFORCEABLE UNDERTAKING:

\$1,045,000

Section 6 – Execution of Undertaking

Westrock Oceania Pty Limited give this undertaking and commit to the terms herein.

Signed: 

[Executed on behalf of Westrock Oceania Pty Limited in accordance with section 127(1) of the Corporations Act 2001]

Name: Rafael de Souza

Position: General Manager Consumer Packaging Pacific

Dated at Richmond this 9th day of October, 2025

Witnessed in the presence of:

Signed: 

Name: Alexander Mark Nicoletti

Dated at Richmond this 9th day of October, 2025

Section 7 – SafeWork NSW's acceptance of undertaking

I accept this undertaking as an enforceable undertaking under section 216 of the WHS Act.

Signed:



Name: Mary Snell

Position: Executive Director, Operations and Enforcement.

Authorized delegate for SafeWork NSW.

Dated at Parramatta this 17th day of October, 2025

Annexure 1 – Public Notice of SafeWork NSW’s acceptance of undertaking

Notice of Acceptance of an Enforceable Undertaking under Part 11 of the Work Health and Safety Act 2011.

On 2 July 2022, a Sheeter Operator had their left hand caught and drawn in-between two rollers on the Sheeter Machine. The worker’s hand was trapped until emergency services arrived.

SafeWork NSW investigated the incident and subsequently alleged that Westrock Oceania Pty Limited contravened section 19(1) and 32 of the Work Health and Safety Act 2011.

SafeWork NSW has accepted an enforceable undertaking from Westrock Oceania Pty Limited, ACN 000 592 745 in accordance with Part 11 of the Work Health and Safety Act 2011 in relation to the abovementioned alleged contravention. This notice has been placed under the terms of the Enforceable Undertaking and acknowledges acceptance of the Enforceable Undertaking by Westrock Oceania Pty Limited.

The undertaking requires the following actions:

- Automation of the Flat Work area to reduce the interaction between people and mobile plant items and reduce manual handling injuries to workers
- A third-party machine safety audit with a focus on fixed/removable guarding, interlock devices, electronic monitoring systems and human machine interaction
- Sharing lessons and safety successes with industry through the development and promotion a case study.

Westrock Oceania Pty Limited is committed to ensuring, as far as reasonably practicable, the ongoing health and safety of its workers and other persons. Westrock Oceania Pty Limited sincerely regrets the alleged contravention and extends its sympathy to the injured worker and their family, Westrock Oceania Pty Limited workers and any others who have been affected by the incident.

This undertaking provides the ability to make further improvements in relation to health and safety within Westrock Oceania Pty Limited and its workforce, the industry and local community”.

The full undertaking and general information about enforceable undertakings is available at safework.nsw.gov.au.