

Environmental incident respo and management

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Contact Information

The latest version of this document and other standards, are located on Endeavour Energy's standards website located at:

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For any enquiries relating to the content of this document please contact the Standards Coordinator on 133 718.

Document Control

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1 Documentation Scope

The purpose of this standard is to provide instructions for managing and reporting environmental incidents.

This standard aligns with Endeavour Energy's Incident Management Plan and addresses all environmental incidents. This standard applies to Endeavour Energy workers and ASPs, whether in offices, the field or workshop locations.

2 References

External Regulations		
Biodiversity Conservation Act 2016 (NSW)		
Electricity Network Assets (Authorised Transactions) Act 2015 (NSW)		
Environmental Planning and Assessment Act 1979		
Environment Protection and Biodiversity Conservation Act 1999 (Cth)		
Contaminated Land Management Act 1997		
Heritage Act 1977 (NSW)		
Local Land Services Act 2013 (NSW)		
National Parks and Wildlife Act 1974 (NSW)		
Protection of the Environment Operations Act 1997 (NSW)		
Water NSW Act 2014 (NSW)		
Work Health and Safety Act 2011 (NSW)		
Electricity Supply (Safety and Network Management) Regulation 2014 (NSW)		

External Standards		
Standard No.	Year	Title
AS/NZS ISO 14001	2016	Environmental management systems - Requirements with guidance for use
Doc 01-2008	2008	ENA National Electricity Network Safety Code (Doc 01-2008)
CoP for ANOs	2015	NSW Code of Practice for Authorised Network Operators, NSW Department of Planning and Environment, September 2015
IPART Reporting Manual	2023	IPART Electricity networks reporting manual (incident reporting), June 2023

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Company Policies and Procedures	
Board Policy (Environment) 4.0- Environmental Sustainability	
Company Policy (Environment) 4.7 – Prevention and Management of Contamination	
Company Policy 2.4- Incident Management	
Company Policy 2.4A- Incident Management Plan	
Company Procedure (Environment) GPE 0009 – Contaminated Land Project Management	
Company Procedure (Environment) GPE 0078 – Environmental Competence, Awareness and Communication	
Company Procedure (Governance) GRG 0001- Licence Compliance Management and Reporting	
Company Procedure (Governance) GRM 0005 – Requests for Legal Advice	
Company Procedure (Governance) GRM 0011 – Incident Management	
Company Procedure (Health and Safety) GSY 0025- Health, Safety and Environment Audit and Assurance	
Company Procedure (Health & Safety) GSY 0050 – Hazardous Chemicals Management	
Company Procedure (Health & Safety) GSY 0051 – Health, Safety and Environment Incident Learning and Reporting	
Company Procedure (Health & Safety) GSY 0097- Reporting of Notifiable Incidents to the Independent Pricing and Regulatory Tribunal (IPART)	
Company Form (Health & Safety) FSY 0118 – Worksite Coordination/Hazard & Risk Assessment	
Branch Form (Safety & Environmental Services) FSE 0002 – Pollution Incident Report	
Branch Form (Safety & Environmental Services) FSE 0003 – Report on breach of NSW Code of Practice for Authorised Network Operators	
Branch Form (Safety & Environmental Services) FSE 0004 – Portable Spill Kit Checklist	

Company Standards	
Environmental Management Standard EMS 0001	Environmental Impact Assessment and Environmental Management Plans
Environmental Management Standard EMS 0012	Notification of access to National Parks and Water NSW Special and Controlled Areas
Environmental Management Standard EMS 0017	Oil Management

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Substation Maintenance Instruction SMI 100	Minimum requirements for maintenance of transmission and zone substation equipment
Substation Maintenance Instruction SMI 106	Zone and transmission substation accommodation
Substation Maintenance Instruction SMI 115	Oil separators and bunds
Safety Information Sheet SIS 1.056	Environmental Incident- Oil Spill Response
Environmental Compliance Obligations Register	
Environmental Guidelines Handbook	

3 Definitions and Abbreviations

Term	Definition
AS	Australian Standard
ANO	An Authorised Network Operator (ANO) is an authorised distributor for a transacted distribution system and/or an authorised transmission operator for a transacted transmission system as prescribed under the <i>Electricity Network Assets (Authorised Transactions) Act 2015</i>
ASP	An Accredited Service Provider (ASP) is a person with accreditation under Part 3 of the Electricity Supply (Safety and Network Management) Regulation 2014 categorised into Levels 1, 2 and 3 as defined by the Department of Industry Resources & Energy under the Accredited Service Provider (ASP) Scheme for contestable works. An ASP is allowed to perform work on behalf of an Authorised Network Operator (ANO) where the ANO is the Determining Authority for that work, as prescribed by Section 110(1) of the <i>Environmental Planning and Assessment Act 1979</i> .
Contractor	A corporation, company or individual engaged to complete work for Endeavour Energy, its branches or sections.
Contamination of land	The presence of a substance in, on or under the land at a concentration above the concentration at which the substance is normally found in that locality such that there is a risk of harm to human health or some other aspect of the environment.
EMP	Environmental Management Plan
Environmental incidents	Unplanned events that have the potential to cause harm to the environment. Environmental incidents can include, but are not limited to: • events or circumstances that are “notifiable” (see definition below) or which result in actual or potential environmental harm; • events that may result in the receiving of a warning, infringement notice or other penalty from a regulator; • an uncontrolled or unauthorised discharge (e.g. sediment, substances other than clean water) into water, air or land from an Endeavour Energy premise, asset and/ or work site; • explosion and/or fire at an Endeavour Energy premise and/ or worksite, or on an Endeavour Energy asset; • unauthorised environmental impact or harm such as: ○ any damage associated with activities being completed by Endeavour Energy within lands managed by WaterNSW under the Water NSW Act 2014 or by National Parks and Wildlife Service (NPWS) (part of Office of Environment

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Term	Definition
	and Heritage (OEH)) under the National Parks and Wildlife Act 1974 (includes damage caused by vehicles driven by Endeavour Energy workers); ○ damage of an aboriginal heritage item or potential archaeological deposit (PAD) without obtaining the necessary prior approvals; ○ damage of a State Heritage Register listed item that is subject to an order or interim order under the Heritage Act 1977 without obtaining the necessary prior approvals; ○ damage to threatened species and or their habitat, endangered populations and/or endangered ecological communities listed under the Biodiversity Conservation Act 2016 and/or the Environment Protection and Biodiversity Conservation Act 1999 without obtaining the necessary prior approvals; ○ damage and/or removal of trees on the local council significant tree register without prior notice or consultation; ○ damage to those aspects of the environment that are Matters of National Environmental Significance (MNES) as identified in Environment Protection and Biodiversity Conservation Act 1999 without obtaining the necessary prior approvals (refer to MNES definition for further information); and/or ○ removal of trees within State Protected Lands, such as, within 20 metres either side of a watercourse, or on steep land (over 18°); • unlawful waste management practices from a company worksite and/ or premise; • creation of offensive noise from works or in-service equipment that impacts on the surrounding community; • illegal dumping by a third party on Endeavour Energy owned land and/or easements; • a verified environment related community complaint such as: ○ complaints associated with any of the abovementioned environmental incidents originating from members of the public or from the OEH/EPA; and/or ○ complaints in relation to activities where an environmental assessment has been prepared in accordance with EMS 0001 – Environmental Impact Assessment and Environmental Management Plans; • a breach of the NSW Code of Practice for Authorised Network Operators in accordance with EMS 0001 – Environmental Impact Assessment and Environmental Management Plans; • a breach of an environmental legal obligation or licence condition, or any form of contravention to the existing access consents with Water NSW and/or OEH; and • non-compliance with Endeavour Energy's legal obligations (as per the Environmental Compliance Obligations Register).
Environmental Near Miss	An incident where no actual regulatory breach or unauthorised environmental impact occurred but there was potential for a regulatory breach or unauthorised environmental impact to occur, i.e. the incident was a close call and could result in an incident in the future unless improvement actions are implemented.
Environmental Hazards	An observation, task, condition, process or equipment that has the potential to result in future environmental incidents if not controlled
EPA	The NSW Environment Protection Authority administers the <i>Protection of the Environment Operations Act 1997</i> .

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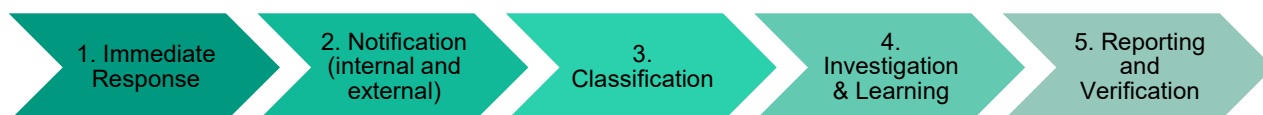
Term	Definition
ICAM	Incident Cause Analysis Method (ICAM) is a systematic incident investigation analysis method that: enables identification of systemic health, safety or environmental deficiencies within the company's Health and Safety and/or Environment Management Systems; and provides appropriate recommendations for corrective actions are made for continuous improvement in order to prevent those factors contributing to future similar incidents.
Immediately	In the context of this standard, immediately means promptly and without delay, after the person becomes aware of the incident.
Incident Management Plan	The company's Incident Management Plan is designed to provide a framework to guide the company through a major disruptive Incident.
IPART	Independent Pricing and Regulatory Tribunal
Legal Professional Privilege (LPP)	Rule of law which prevents the communications between legal practitioners and their clients being disclosed to third parties.
Licensed Liquid Waste Contractor	The licensed liquid waste contractor engaged by Endeavour Energy to respond to and clean up environmental incidents.
MNES	Matters of National Environmental Significance (MNES) are protected under the <i>Environment Protection Biodiversity Conservation Act 1999</i>. MNES relevant to the Endeavour Energy network area include: - wetlands of international significance (that is Ramsar wetlands) and marine key features; - Commonwealth listed threatened species or ecological communities; - Commonwealth listed migratory species; - World heritage properties; and - National heritage places.
Notifiable incident (Material harm)	Defined as an incident that must be reported to the EPA and/or OEH (via the Environment Hotline Phone – 131 555) and/or IPART. In the case of a pollution incident this must be reported <u>immediately</u> to the EPA, Ministry of Health, SafeWork NSW, Local Council, and Fire and Rescue pursuant to the <i>Protection of the Environment Operations Act 1997</i>. A notifiable incident is one that causes material harm to the environment. In the case of a serious breach of the NSW Code of Practice for Authorised Network Operators this must be reported as soon as reasonably practicable to IPART. A serious breach includes a breach which has, or is likely to have, a material adverse impact on the environment. With regards to a pollution incident, as per POEO Act 1997 Section 147, harm to the environment is material if it: - involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; and/or - results in actual or potential loss or property damage in excess of \$10,000, including the costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate or remediate harm to the environment.
OEH	Office of Environment and Heritage

Term	Definition
PCBU	A person conducting a business or undertaking (PCBU) has the meaning as prescribed under the <i>Work Health and Safety Act 2011 (NSW)</i> and for the purpose of this standard, is either Endeavour Energy or a contractor of Endeavour Energy who employs workers to undertake duties on its behalf.
Pollution incident	An incident or set of circumstances during, or as a consequence of which, there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.
Populations	A group of organisms, all of the same species, occupying a particular area as defined in the <i>Biodiversity Conservation Act 2016 (NSW)</i>
PPE	Personal Protective Equipment
POEO Act (NSW)	<i>Protection of the Environment Operations Act 1997 (NSW)</i>
SAP EHS	Incident management system used by the company to record and manage health, safety and environment information such as hazards, incidents (actual and near misses), investigations, actions or task etc.
SCAR	Safety Corrective Action Request
WHRA	Workplace Hazard and Risk Assessment
Worker	A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: (a) an employee; or (b) a contractor or subcontractor; or (c) an employee of a contractor or subcontractor; or (d) an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or (e) an outworker, i.e. a person who performs work for an employer at their own home or at another location that is separate from their employer's factory, workshop, office or worksite; or (f) an apprentice or trainee; or (g) a student gaining work experience; or a volunteer.

4 Technical Requirements

As per company procedure GSY 0051 Health, Safety and Environment Incident Learning, management of environmental incidents will follow the actions outlined in Figure 1 below.

Figure 1: Actions for incident management



4.1 Immediate response to an environmental incident

4.1.1 General Requirements

Follow the guidance provided in the environmental incident response flowchart included in Annexure 2 when responding to environmental incidents. This includes firstly assessing for danger and making safe.

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All environmental incidents must be logged immediately into SAP EHS and notified to your supervisor and the Environmental Specialist (if required). The Endeavour Energy Call Centre (131 003) can assist in logging environmental incidents into SAP EHS if required.

The following information is required when logging an environmental incident:

- name and contact details;
- location of incident;
- time of incident occurring; and
- nature of the incident.

If you require additional Endeavour Energy resources or licensed liquid waste contractor to assist in responding to a spill, call the Endeavour Energy Call Centre (131 003) for assistance. They will:

- Log the environmental incident into ADMS to mobilise Endeavour Energy workers to respond to:
 - incidents involving leaks from Endeavour Energy equipment; and/or
 - all leak and spill related incidents if the spill is beyond the capacity of the spill kit materials carried by or available to on-site Endeavour Energy workers and ASPs.
- Contact and mobilise the licensed liquid waste contractor engaged by Endeavour Energy if required.
- Contact the Fire Brigade (using the 000 phone number) when:
 - a major incident occurs; and/or
 - life, property or the environment are under threat from the incident, for example, an oil spill threatens to enter drains or a waterway, which cannot be adequately controlled by Endeavour Energy spill response efforts; and/or
 - Endeavour Energy workers to respond to spills cannot be engaged immediately.

4.1.2 Response to an oil – related environmental incident

In the event of an oil-related environmental incident, and if safe to do so, the Endeavour Energy workers and/or ASPs on site must immediately deploy spill kit materials. A spill kit must be available on all plant and equipment containing hydraulic oil and designated plant transporting oil filled equipment. Endeavour Energy Field Operations must also have access to a spill kit to make initial efforts to appropriately control, contain and clean-up the spill if they are the first respondents. The environmental response process of “control, contain and clean-up” is outlined in Annexure 2 – Environmental Incident Response Flowchart.

Where the spill is beyond the capacity of on board spill kits, additional assistance from Endeavour Energy Rapid Response or Regional crews can be requested by calling the Endeavour Energy Call Centre (131 003) as outlined above in Section 5.1.1. Supplementary spill kits (120 litre kit with a red lid) are available at Field Service Centres (FSCs) for this purpose.

The relevant Endeavour Energy Environmental Specialist must be contacted in the event that oil has or potentially will cause environmental harm (e.g. oil entering drains). The Endeavour Energy Environmental Specialist will make an assessment of external reporting requirements on the basis of severity of the environmental incident (Section 5.2.2).

If the leak cannot be stopped promptly, Endeavour Energy workers responding should consider the requirement and practicality of a container to be positioned under the leaking equipment to control and contain the leak (in addition to spill kit materials). If a container is deployed it should not be left unattended, weather is to be considered (for example rain considered) and it will likely require draining by the licensed liquid waste contractor to prevent further spillage/overflowing.

Endeavour Energy System Control (02 9853 7900) must be engaged with by workers responding to prioritise the replacement of the oil filled equipment if environmental harm is imminent.

Refer to Safety Information Sheet 1.056 Environmental Incident – Oil Spill Response for additional guidance in the requirements for responding to oil spills within the field that pose an environmental threat.

4.2 Notification

4.2.1 Internal Reporting

As discussed in Section 5.1, all environmental incidents must be logged immediately into SAP EHS. As per requirements in company procedure GSY 0051, it is the responsibility of the person involved in the incident to immediately notify their Supervisor as soon as practicable following the immediate response (within the first 60 minutes). For any incident that has resulted in actual or potential environmental harm, contact the relevant Environmental Specialist immediately after being made aware of the incident.

For incidents involving contractors, the relevant Project Manager or project authorised person is responsible for confirming that the incident has been recorded in SAP EHS. For incidents involving ASPs, the Customer Connections Manager or nominated delegate is responsible for confirming that the incident has been recorded in SAP EHS.

The Environmental Services Manager will review all incidents in SAP EHS to determine whether further action is required and to confirm that corrective actions (if relevant) are completed to a satisfactory and timely standard. Results of this review will be documented in a report by the Head of Sustainability (or nominated delegate) to the Executive Health, Safety and Environment Committee (EHSEC).

4.2.2 External Reporting

External reporting requirements are detailed below. Please refer to “External Contacts” listed in Annexure 1 – Environmental Incident Response Contact List for contact details for relevant external stakeholders.

4.2.2.1 NOTIFIABLE INCIDENTS

In the event of a notifiable incident (Levels 2, 3 and 4) that presents a direct threat to human health or property, the Incident Manager (as outlined in Section 5.3.1) will confirm emergency services (000) have been contacted immediately (note that on site, Endeavour Energy workers and/or ASPs and/or the Endeavour Energy Call Centre may have already contacted emergency services as set out in Section 5.1).

If the notifiable incident is a pollution incident, the Head of Sustainability or their nominated delegate must immediately notify relevant authorities by telephone in the following order:

- EPA;
- Fire and Rescue NSW (if not already contacted).

In accordance with Branch Form FSE 0002 – Pollution Incident Report, the following information must be provided to each of the above agencies after the verbal notification:

- the time, date, nature, duration and location of the incident;
- the location of the place where pollution is occurring or is likely to occur;
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- the circumstances in which the incident occurred (including the cause of the incident, if known); and
- the action taken, or proposed action be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If any of the above information is not known when the initial notification is made but becomes known afterwards, the Head of Sustainability or nominated delegate must provide this information immediately after it becomes known by providing updates to the relevant agencies.

If the notifiable incident involves threatened or endangered species and/or populations, or heritage items, notification to the OEHS is required. Reporting of the incident may also extend to the land owner and/or manager, as well as other regulatory authorities (for example, Heritage Council and Water NSW).

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4.2.2.2 BREACHES OF THE NSW CODE OF PRACTICE FOR AUTHORISED NETWORK OPERATORS

Endeavour Energy must report a serious breach of the NSW Code of Practice for Authorised Network Operators to IPART for activities that involved the preparation of an environmental assessment in accordance with EMS 0001 – Environmental impact assessment and environmental management plans. As per IPART's Electricity networks reporting manual (June 2023), serious breaches must be reported to IPART as soon as reasonably practicable by Endeavour Energy. A serious breach includes a breach which has, or is likely to have, a material adverse impact on the environment.

IPART have indicated they are more interested in breaches during the determination phase as opposed to the implementation phase of an activity.

The Head of Sustainability or nominated delegate is responsible for reporting serious breaches to IPART by telephone. This is to be followed up by a more detailed written report using Branch Form FSE 0003 – Report on breach of NSW Code of Practice for Authorised Network Operators. This written report is to be provided to IPART's Chief Executive Officer from Endeavour Energy's Chief Executive Officer within 30 calendar days as per IPART's Electricity networks reporting manual (June 2023).

Both serious and minor breaches of the NSW Code of Practice for Authorised Network Operators should be recorded in SAP EHS and are required to be reported annually to IPART as per company procedures GRG 0001- Licence Compliance Management and Reporting, and GSY 0097- Reporting of Notifiable Incidents to the Independent Pricing and Regulatory Tribunal (IPART).

4.2.2.3 DUTY TO REPORT CONTAMINATION ON ENDEAVOUR ENERGY SITES

With regards to the identification of contamination on an Endeavour Energy site, refer to Company Policy 4.7 – Prevention and Management of Contamination for guidance on when Endeavour Energy has a duty to report contamination.

4.2.2.4 MANAGEMENT OF REGULATORY AUTHORITIES AND THE MEDIA

In response to an environmental incident, officers of authorities such as the local council, police and the EPA/OEH/IPART may visit the site. The Head of Sustainability (or nominated delegate) must be notified immediately when authorities are on-site for the purpose of investigating an environmental incident or to issue penalty notices. The following actions must be undertaken when authorised officers of authorities are on-site:

- Workers and ASPs are to refer the officer's enquiries to the Head of Sustainability (or nominated delegate) where they are unable to assist.
- Officers must be accompanied by a senior site representative around the Endeavour Energy worksite and/ or premises, and relevant WHS procedures must be followed. An Environmental Specialist must be present when the EPA/ OEH/ IPART officers are on-site for the purposes of investigating an environmental incident.
- Any requests from the EPA/ OEH/ IPART for documents must be referred to the Head of Sustainability (or nominated delegate).
- All media inquiries are to be forwarded to the Manager Corporate Affairs (refer to "Internal Contacts" listed in Annexure 1 – Environmental Incident Response Contact List).

4.2.2.5 LEGAL COUNSEL NOTIFICATION AND LEGAL PROFESSIONAL PRIVILEGE

Please refer to company procedure GSY 0051 Health, Safety and Environment Incident Learning and Reporting for guidance on legal counsel notification and legal professional privilege.

4.3 Classification of environmental incidents

Environmental incidents are classified as Levels 1, 2, 3 or 4 depending on the severity, extent of impact and the consequences, as outlined in Company Policy 4.2 Incident Management Plan and summarised in the table below. The incident level provides the guidance for the appropriate response to the incident.

Incident Level	Incident classification criteria
Level 1- Low (or Minor in GSY 0051) Minor impact on biological or physical environment or heritage item over a limited area. Little or no need for remediation.	- Low impact and may include native fauna unintentionally harmed or killed (e.g. bird strike, vehicle collision), small spill or emission (e.g. oil, gas, chemical) contained on site with no or minor clean- up needed, native vegetation impacted < one hectare from fire, pest, weed and disease spread. - Minor non – compliance with the company's environmental procedures, EMP, approval conditions (no fine), or legislation (e.g. potential release of contamination- oil, chemicals, sediment) to storm water. - Environmental nuisance (short term impact) caused by noise, dust, odour, fumes, light. - Localised damage to heritage. - Any minor breach of the NSW Code of Practice for Authorised Network Operators.
Level 2- Medium (or Moderate in GSY 0051) Moderate damage over a large area or affective ecosystem, or heritage item. Moderate remediation is required.	EPA/ OEH/ IPART notifiable incident resulting in any one or more of the following: - Pollution incident deemed notifiable in accordance with Part 5.7 POEO Act that results in medium impact- spill or emission (e.g. oil, gas or chemical) not contained on site with clean- up needed. - Harm to threatened species or EEC, native vegetation impacted >1 to <10 hectares from fire, or native vegetation impacted from unapproved clearing or maintenance practice. - Non- compliance with company environmental procedures, or EMP, or approval/license/permit conditions. - Moderate damage to a heritage item. - Warning letter and potential penalty infringement notice issued by regulatory authority. - Estimated cost of remediation \$5,000 to \$50,000.
Level 3- High (or Major in GSY 0051) Serious widespread, long term damage to ecosystem or heritage item. Significant rectification is required.	EPA/ OEH/ IPART notifiable incident resulting in any one or more of the following: - Pollution incident deemed notifiable in accordance with Part 5.7 POEO Act that results in large spill (e.g. oil or chemical) into sensitive area (e.g. fish habitat, potable water supply,) on site and/or requiring emergency services attendance. - Serious non - compliance of the company's environmental procedures or EMP, or approval conditions, or legislation, or investigation by authority with potential prosecution/fines >\$1,000. - Serious breach under the Code of Practice for Authorised Network Operators. - Major loss of habitat or impact on biodiversity, or native vegetation impacted >10 or <1000 hectares from fire, native vegetation impacted from unapproved clearing. - Serious widespread, long term damage to heritage.

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Incident Level	Incident classification criteria
	• Potential litigation and regulator scrutiny. • Estimated cost of remediation \$50,000 to \$500,000.
Level 4- Extreme (or Severe in GSY 0051) Permanent widespread impairment to ecosystem or heritage item.	EPA/ OEH/ IPART notifiable incident resulting in any one or more of the following: • Pollution incident deemed notifiable in accordance with Part 5.7 POEO Act, and/or incident that results in high, irreversible, long term or widespread impact (spill or habitat disturbance) to sensitive environment (e.g. national park, world heritage listed area, site of special significance, potable water). • Major incident resulting from breach of legislation or licence/permit, prosecution, suspension or cancellation of environmental approval/licence/permit. Significant financial penalties and extensive litigation. • Estimated cost of remediation >\$500,000.

4.3.1 Assigning the Incident Manager

In the event of an incident, the nearest most senior person must assume the role of the initial incident manager until the incident has been classified and the appropriate Incident Manager has been appointed.

In the event of a Level 1 or Level 2 incident, the Head of Sustainability or nominated delegate will assume the role of Incident Manager and lead the development and implementation of a response strategy.

Where an environmental incident has the potential to escalate to a major incident (Level 3), the role of Incident Manager will be assumed by the Chief Data, People and Sustainability Officer. A Level 4 event will be managed by the Chief Executive Officer's appointment.

The Incident Manager will marshal appropriate internal and external resources, develop the response strategy and coordinate the overall response to the incident.

4.3.2 Roles of the Head of Sustainability

The Head of Sustainability or nominated delegate will undertake the following actions:

- notify external agencies as required (refer to Section 5.2.2 and Annexure 1);
- seek legal advice where warranted, in accordance with Company Procedure GRM 0005 – Requests for Legal Advice;
- notify internal stakeholders (refer to "Internal Contacts" listed in Annexure 1);
- confer with the Manager Corporate Affairs, define lines of communication and verify that the content of any media releases or information for internal and external stakeholders is technically accurate;
- manage communication with the EPA, OEH and/or IPART; and,
- allocate an investigator to complete an investigation.

4.4 Investigation and Learning

4.4.1 Investigation

Environmental incidents will be investigated where any of the following criteria have been met:

- the incident has resulted in actual or potential environmental harm and may trigger a regulator response; and/or

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- the incident has resulted in actual or potential reputational damage; and/or
- the incident may have implications on the wider business or result in a change of policy or procedure.

The incident investigation must be completed in accordance with the Incident Cause Analysis Method (ICAM) and Company Procedure GSY 0051 – Health, Safety and Environment Incident Learning and Reporting.

4.4.2 Continual improvement

Lessons learnt can be derived from multiple sources as follows:

- response to environmental incidents;
- investigation of environmental incidents;;
- audit of environmental incident response and management system;
- review of incidents and associated corrective actions in SAP EHS ;
- testing of environmental incident response; and
- the WHRA process.

The Environmental Services Manager is responsible for identifying lessons learnt from the sources listed above and working with the Sustainability, Systems and Assurance Manager to incorporate them as appropriate into existing company standards and procedures.

Communication of continual improvement lessons learnt should be in accordance with Company Procedure GSY 0051 – Health, Safety and Environment Incident Learning and Reporting.

Annual sampling of oil water separators at substations and FSCs is to be completed to provide assurance that maintenance regimes discussed in Section 5.5.2 are adequate. It is aimed that oil water separators at representative number of substations and FSCs will be sampled annually. Sampling results are to be filed in the Environment and Sustainability sharepoint site.

4.5 Reporting and Verification

4.5.1 Testing environmental incident response

The Environmental Services Manager will periodically review the response to environmental incidents and implement corrective actions where it is deemed necessary.

This standard will be tested annually through an environmental incident if one occurs, or through a mock incident. The Environmental Services Manager is responsible for coordinating and managing the testing of the environmental incident response process.

4.5.2 Maintenance of environmental incident controls

4.5.2.1 ZONE AND TRANSMISSION SUBSTATIONS

The maintenance of bunds and oil water separators installed in zone and transmission substations, including appropriate testing of associated alarms, is to be completed in accordance with company standard SMI 115 Oil separators and bunds.

The inspection and checking of spill kits, drains, gross pollutant traps/ onsite detention systems and for the presence of weeds at zone and transmission substations is to be completed in accordance with company standard SMI 106 Zone and transmission substation accommodation.

The frequency of inspections and maintenance detailed in SMI 106 and SMI 115 is defined in company standard SMI 100 Minimum requirements for maintenance of transmission and zone substation equipment.

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4.5.2.2 FIELD SERVICE CENTRES (FSCS)

Wash bays and associated oil water separators are to be cleaned and serviced quarterly in accordance with the respective Trade Waste Agreement by an appropriately licensed liquid waste contractor.

At Hoxton Park FSC, Narellan FSC and Springhill FSC there are large bunds present for oil storage. These are fitted with an oil water separator that discharges to ground. These oil water separators and associated pits are to be cleaned and serviced as required by an appropriately licensed liquid waste contractor.

Spill kits at FSCs are to be inspected annually. Inspections are managed by the Environmental Services team.

Weeds, drains and gross pollutant traps/ onsite detention systems at FSCs are inspected every six months by the relevant Environmental Specialist in accordance with company procedure GSY 0029 Health, Safety and Environment Site Inspections. In addition, these items are also inspected regularly by Property and Fleet to determine maintenance requirements.

4.5.2.3 VEHICLE SPILL KITS

Spill kits on vehicles are to be inspected every six months. This is normally completed during Safety Days. An electronic form is available on electronic platforms, (Safety Day Inspection App), or Form FSE 0004 is available to assist with inspecting and restocking vehicle spill kits.

4.5.3 Training

All relevant Endeavour Energy workers and ASPs will be trained in the requirements of this standard in accordance with GPE 0078 – Environmental Competence, Awareness and Communication. The Head of Customer Network Solutions will work with the Head of Sustainability to provide appropriate training and communication to ASPs.

5 Authorities and Responsibilities

Chief Executive Officer has the authority and responsibility for:

- appointing an Incident Manager in the event of a Level 4 incident; and
- providing written confirmation of serious breaches of the Code of Practice for ANOs to IPART's Chief Executive Officer.

Chief Data People & Sustainability Officer has the authority and responsibility for:

- approving this Standard; and
- assuming the role of Incident Manager in the event of a Level 3 incident

General Manager Safety and Operations has the authority and responsibility for endorsing this Standard.

Executive Health, Safety and Environment Committee have the authority and responsibility for:

- reviewing and discussing the environmental incident data; and
- endorsing recommendations arising from incident investigations.

Executive Leadership Team members have the authority and responsibility for implementing relevant recommendations arising from incident investigations within their respective divisions.

Head of Field Operations has the authority and responsibility for providing sufficient resources to respond to environmental incidents involving leaks and spills.

Environmental incident response and management

Head of Sustainability has the authority and responsibility for:

- allocating resources to train all relevant Endeavour Energy workers and ASPs in the requirements of this standard (if applicable may form part of the annual environmental training and communication plan); and
- reporting environmental incidents (by exception) to the Executive Health Safety and Environment Committee.
- assuming or delegating the role of Incident Manager;
- notifying external agencies as required including SafeWork NSW, IPART, EPA and OEH (refer to Section 5.2 and Annexure 1);
- managing communication with the EPA, IPART and OEH;
- seeking legal advice where warranted, in accordance with Company Procedure GRM 0005 – Requests for Legal Advice;
- notifying internal stakeholders (refer to “Internal Contacts” listed in Annexure 1);
- in consultation with the Manager Corporate Affairs, define lines of communication and verify that the content of any media releases or information for internal and external stakeholders is technically accurate; and
- maintaining testing of the Standard is included in the A&I audit plan.

Head of Customer Network Solutions has the authority and responsibility for working with the Head of Sustainability to provide appropriate training and communication to ASPs to familiarise them with the requirements of this standard.

Head of System Operations has the authority and responsibility for:

- coordinating response to environmental incidents logged into ADMS;
- providing sufficient resources to respond to environmental incidents involving leaks and spills; and
- prioritise the replacement of the oil filled equipment if environmental harm is imminent.

Environmental Services Manager has the authority and responsibility for:

- reviewing environmental incidents entered into SAP EHS;
- tracking the completion of any corrective actions;
- periodically reviewing the causes factors and response to environmental incidents and implementing corrective actions for continuous improvement of the company’s processes in preventing and managing environmental incidents;
- managing inspection of spill kits at FSCs on an annual basis; and
- annual testing of oil water separators at a representative number of substations and FSCs annually.

Environmental Specialists have the authority and responsibility for:

- providing technical assistance in the event of environmental incidents where required;
- assisting with identifying causal factors and corrective actions during incident investigation and with the completion of corrective actions in a timely manner; and
- communicating lessons learnt from investigations to contractors and ASPs through Endeavour Energy’s Safety Days or presentations held from time to time.

Sustainability, Systems and Assurance Manager has the authority and responsibility for:

- updating company standards and procedures to reflect lessons learnt from incident investigations.

Customer Service Providers have the authority and responsibility for:

Environmental incident response and management

- documenting environmental incidents within SAP EHS and ADMS (spills so that Endeavour Energy workers can be mobilised to respond); and
- mobilising licensed liquid waste contractor engaged by Endeavour Energy as required.

Customer Connections Managers have the authority and responsibility for:

- confirming that incidents involving ASPs are recorded in SAP EHS.

Project Managers have the authority and responsibility for:

- confirming that incidents involving contractors are recorded in SAP EHS.

Managers have the authority and responsibility for:

- informing and training workers under their control of their responsibilities under this standard;
- complying with the requirements of this standard;
- identifying hazards and risks and the establishment of appropriate preventative measures on Endeavour Energy worksites and/or premises; and
- responding to and investigating environmental incidents in accordance with the requirements of this standard.

Endeavour Energy workers and **ASPs** have the authority and responsibility for working in accordance with this standard at all times.

ANNEXURES

Annexure 1- Environmental Incident Response Contact List

Title	Phone No.
Internal Contacts	
Environmental Services Manager	0475 554 069
Head of Sustainability	0419 296 019
Endeavour Energy Call Centre	13 10 03
Endeavour Energy System Control	(02) 9853 7900
External Contacts	
Emergency Services	000
Fire and Rescue NSW	1300 729 579
EPA Environment Hotline	131 555
OEH Environment Hotline	131 555
Ministry of Health (via Public Health Unit)	1300 066 055
SafeWork NSW	13 10 50
WaterNSW	1800 061 069
Local Councils	Phone numbers listed on <i>Local Government Directory- Local Councils</i> at www.dlg.nsw.gov.au
IPART	9290 8400 or 1300 103 271 Or for serious breaches contact: IPART Director: 9019 1915; or IPART Executive Director: 9019 1904.

Annexure 2- Environmental Incident Response Flowchart

