Governance
This document is approved by the Hydro Tasmania Executive Leadership Team, comprising the Chief Executive Officer (CEO) and all Level 1 Managers.

This document is reviewed at least every three years, or when significant structural changes are made to the Hydro Tasmania Group, and is issued and controlled in accordance with Element 8 (Document & Record Management) and Element 16 (Management Review) of the HSE Management System.

Message from the CEO
At Hydro Tasmania, we are committed to ensuring our staff and contractors have a safe place to work and strive to achieve positive outcomes for the environment and our community. We operate a Health, Safety and Environment (HSE) Management System that describes the processes that Hydro Tasmania Group staff and contractors are required to follow in order to achieve our HSE objectives. This system enables us to manage our HSE risks and to drive improvements. In particular, this management system enables us to implement our safety and environmental policies.

Our HSE system is most effective when we consider it to be part of our daily approach to work.

Roy Adair

Purpose of the manual
This manual sets the context of the HSE Management System, and provides a description of the sixteen management system elements. These elements describe what the management system aims to achieve in each element, rather than how it is achieved. The procedures, reference documents, forms and registers that sit below each element provide the detail of how Hydro Tasmania Group intends to achieve the element outcomes.
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Introduction

We conduct ourselves and our business with due care and in compliance with relevant laws and regulations. We have an overriding duty to ensure the health and safety of our employees and to minimise the HSE risks to our customers and the communities in which we operate.

Sustainability for Hydro Tasmania involves the transparent and balanced application of economic, environmental and social considerations to business decisions and activities. Hydro Tasmania believes that these considerations enable the business to address community and stakeholder expectations and ensure long-term business success.

Hydro Tasmania is committed to creating a sustainable future. Our sustainability code identifies the seven principles that guide our business through articulating what it means for us to be sustainable. Each of the seven principles has a vision statement and attributes to measure our performance. Throughout the business, our Strategy On A Page (SOAP) is aligned to the principles of the sustainability code.
Hydro Tasmania group

Sustainability Code

Hydro Tasmania is Australia’s leading clean energy business. We generate power from clean sources of energy and trade electricity and energy-related environmental products in the Australian market. Our vision is to be “Australia’s leading clean energy business, inspiring pride and building value for our owners, our customers and our people”.

Our consulting business, Entura, offers power engineering, renewable energy, water and environmental solutions internationally. Our electricity retailer, Momentum enables the Hydro Tasmania business to operate as an integrated energy provider, specialising in serving industrial and business customers.

Our sustainability vision

Sustainability is one of our core values expressed through our commitment to create a sustainable future. We believe that making a commitment to sustainability makes good business sense.

Our sustainability principles

Governance
We make our decisions within comprehensive governance and risk management frameworks while seeking to continually improve our business processes.

We make ethical decisions by applying our values, sustainability principles and Code of Ethics, complying with relevant legislation and delivering on the commitments we make.

Infrastructure and Resources
We manage our infrastructure and resources optimally for present and future reliability and with the highest standards of safety.

Economic
We make sound commercial and investment decisions in our chosen markets, to deliver long-term business value and meet shareholder expectations.

We leverage our low carbon generation and competitive customer focus to create value for our shareholders, the people of Tasmania.

Customers
We know that our customers have a choice. We aim to be the first choice through understanding, responding and delivering sustainable solutions to our customers.

We are innovative and creative in developing new products and services in response to the needs of our customers and in order to retain our competitive edge in the marketplace.

Community
We understand that we have the potential to impact on people through our activities. We:

» aim to have regular, open and transparent dialogue with our community;

» aim to make a genuine difference in the communities in which we operate; and

» work with our customers, stakeholders, suppliers and partners to contribute to a sustainable future.

Our people
We will continue to:

» offer opportunities for our employees to grow and develop;

» reward, recognise and value employee contribution;

» listen and engage with our employees and maintain sound employment relations;

» ensure a diverse and equitable workplace; and

» provide a safe and healthy working environment.

Environment
We aim to minimise our impact on the environment and seek opportunities to enhance environmental, cultural and heritage values.

As climate change has significant implications for our business we are committed to being part of a sustainable solution.

For further information on how we apply our sustainability code to our business please see www.hydro.com.au/sustainability.

Signed by Roy Adair CEO for review in 2014

The sustainability code applies to all operations of the Hydro Tasmania Group
The HSE policies are derived from these sustainability principles, and consideration of all principles is given in the underlying HSE Management System procedures.

In addition to the sustainability principles, HSE Management System procedures also adhere to Hydro Tasmania Group Cardinal Rules, Values and Code of Conduct.
Commitment
We are committed to providing and maintaining a safe and healthy work environment for our people, contractors, customers, and visitors. Our responsibility extends to ensuring Hydro Tasmania’s operations do not place the local community at risk.

Objectives
To fulfill our commitment we will:
- ensure compliance with all legislative requirements
- provide and maintain a safe working environment and safe systems of work
- maintain and communicate written procedures and instructions to ensure safe systems of work
- provide measurable objectives and targets, ensuring continuous improvement to our safety performance
- provide appropriate information, training and supervision to our people, contractors and visitors
- encourage and support our people to manage their mental and physical health through initiatives offered under our fitness for work program
- ensure timely rehabilitation and return to work plans for work and non-work related injury and illness.

Responsibilities
The Executive Leadership Team has overall responsibility to provide a safe and healthy workplace. Line managers and other accountable persons are responsible for the implementation of this commitment. This encompasses:
- ensuring effective controls are in place to manage hazards
- procedures and systems are in place to ensure the workplace is maintained in a safe condition
- health and safety procedures are implemented and feedback is provided to continuously improve these procedures
- resources are available to meet health and safety commitments.

Our people have a duty to:
- take reasonable care for their own health and safety and for the health and safety of other persons
- maintain the workplace in a safe condition and encourage others to undertake safe work practices
- follow all health and safety procedures and participate in scheduled training and information sessions
- proactively rectify and/or report hazards and near misses
- promptly report any injury, accidents or incidents.

Consultation
Hydro Tasmania is committed to regularly consult with our people and contractors to ensure that this commitment and associated procedures operate effectively and that health and safety issues are regularly reviewed.

Review and authorisation
This commitment will be reviewed periodically, but no later than three years from date of last review. Approved as at October 2009.

This commitment may not be the latest version. Please refer to MyHydro for the current copy.
Hydro Tasmania

Environmental Policy

A Sustainable Future through Responsible Management

We want current and future generations to enjoy the benefits of a clean and healthy environment. We endeavour to operate our existing assets, and provide services and solutions to our clients, in an environmentally responsible manner.

Environmental Commitments

We are committed to:

• leadership in environmental management,
• careful management of natural resources and preventing pollution,
• encouraging efficient use of energy,
• a cooperative approach to catchment management, and
• supporting sustainable developments.

We do this by:

• continual improvement in environmental management practices,
• implementing objectives and targets that support our environmental policy and strategic directions,
• offering environmentally responsible products and services,
• integrating environmental considerations into research and development, planning, new projects, investments and operations, and
• ensuring our staff and contractors have the necessary expertise to fulfil their environmental responsibilities.

Compliance with Regulatory Requirements

We ensure our activities, products and services comply with environmental legislation as well as relevant environmental commitments and agreements.

Open and Effective Relationships

We work cooperatively with our customers, stakeholders and the community to find practical solutions to environmental management issues. We are open and honest in our provision of environmental information and ensure that we have processes for listening to our customers and stakeholders. Our environmental performance is publicly reported.

Reviews of Environmental Performance

We conduct regular reviews of our environmental performance to ensure that we are meeting our objectives and targets.

This policy may not be the latest version. Please refer to MyHydro for the current copy.
HSE Management System scope

This document and the associated HSE Management System applies to the Hydro Tasmania Group, including Momentum Energy (Victoria) and Entura (all Australian offices).

The HSE Management System is designed to address:

- **Hydro Tasmania**
  - The design, construction, operation, and maintenance of electricity generation infrastructure, including power stations (hydro-electric, gas-fired thermal, diesel, and wind)
  - Management of associated roads, buildings, land, lakes and waterways
  - Activities associated with electricity generation
  - Operation of attractions, which may include museums, visitors centres and display centres

- **Entura**
  - Engineering and environmental consulting services for power, energy, and water activities in the areas of:
    - renewable energy
    - power transmission
    - hydro power
    - water management
    - water infrastructure
    - dams
    - environmental management and planning

- **Momentum Energy**
  - The promotion and sale of energy products for all jurisdictions in which Momentum Energy Pty Ltd is licensed to retail electricity
  - The provision of assistance and advice to customers to become more sustainable
  - Resource use, waste production, and travel associated with the energy retail business

The Hydro Tasmania Group is referred to as Hydro Tasmania for the remainder of this document.
The HSE Management System – a risk management approach

Safety and environmental risks are managed to an acceptable level for activities undertaken by Hydro Tasmania employees and contractors. The management system aligns with the Plan, Do, Check, Act approach. The following diagram illustrates how the Hydro Tasmania HSE elements fit this model.

**PLAN**
1. Policy & commitment
2. Legal & other requirements
3. Hazard identification & risk management
4. Planning & objectives

**DO**
5. Accountability & leadership
6. Awareness, training & competency
7. Communication, consultation & involvement
8. Document & record management
9. Assets & operations
10. Project management
11. Management of contractors & suppliers
12. Emergency preparedness

**CHECK**
13. Monitoring & measuring
14. Incident management
15. Audit

**ACT**
16. Management review

*The 16 elements of the HSE Management System align with the Plan, Do, Check, Act approach.*
The HSE Management System elements

The elements are consistent with Hydro Tasmania’s Occupational Health and Safety policy, environmental policy, ISO 14001 and OHSAS 18001. The objectives of the management system are to provide:

- documented processes to cover situations where their absence could lead to deviations from HSE policy and objectives
- auditable criteria against which the HSE Management System is measured
- a basis from which to drive continual improvement

The elements define what must be achieved rather than how to achieve it.

The elements describe requirements in the areas of HSE with the following aims:

- **Health**
  - Protect, promote, and improve the health and wellbeing of our employees
  - Minimise and manage occupational exposures to our staff and contractors

- **Safety**
  - Provide a work environment where people are able to work safely and understand their rights and obligations towards a safe workplace

- **Environment and community**
  - Protect environmental and heritage values
  - Promote the reduction and prevention of pollution, efficient use of resources and energy, and biodiversity protection
  - Consider the environment and social impact of the resources, products, and services we use or provide to others
The HSE manual forms a key part of the HSE Management System, guiding the structure of HSE procedures and associated documents.
Application of the HSE Management System
The HSE Management System applies to HSE-related matters arising out of activities and operations controlled by Hydro Tasmania, and the impact of those activities and operations on employees, contractors, the environment and the communities in which we operate. Hydro Tasmania’s lines of business are required to provide appropriate information and to take actions as required by the HSE Management System to ensure conformance with the criteria established in the HSE elements.

The HSE Management System incorporates HSE requirements for the company. Individual areas of Hydro Tasmania establish the necessary HSE plans to comply with this HSE Management System, and have the discretion to establish procedures where company-wide HSE protocols and procedures do not cover issues specific to that area.

Accountability and responsibility
Hydro Tasmania’s HSE Management System is based on the premise that HSE is everyone’s responsibility.

The management hierarchy is:

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  CEO

  Level 1 Management (Line of Business Management)
  e.g. MD Entura; Director, Corporate Services (Hydro Tasmania);
        CO Technical & Operations (Hydro Tasmania)

  Level 2 Management (Group/Team Managers)

  Level 3 Team Manager/Employee
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The OH&S and environmental policies outline overall HSE direction and objectives and demonstrate Hydro Tasmania’s commitment to improving HSE performance.

1.1. Hydro Tasmania maintains HSE policies that reflect the nature, scale and potential HSE impacts of our activities, products, and services. They describe Hydro Tasmania’s commitment to:

1.1.a. the prevention of incidents that may lead to injuries, illnesses, pollution, and damage to property and the environment;

1.1.b. compliance with legal and other requirements, including international accords and external requirements to which Hydro Tasmania subscribes;

1.1.c. aspiring to leading practice in key HSE areas through continual improvement;

1.1.d. providing the resources needed to meet our HSE performance objectives; and

1.1.e. the effective management of HSE risks.

1.2. HSE-related policies are reviewed at least every three years, or at times of significant structural change within Hydro Tasmania, and are approved by the Board and signed by the CEO. This review ensures these policies reflect the needs and priorities of the business.

1.3. The Hydro Tasmania Board of Directors seeks assurance of conformance with the HSE policies and systems, and regularly reviews HSE performance and risks.

1.4. HSE management plans, programs, procedures, and practices, which are in conformance with the HSE elements, are implemented and supported by those working for Hydro Tasmania.

1.5. Activities conducted by Hydro Tasmania, including those conducted by contractors or by other companies on behalf of Hydro Tasmania, conform to the HSE policies.

1.6. Any changes to organisation structure, activities, processes, or requirements are reviewed for HSE implications, and necessary system changes are implemented.

1.7. HSE policy is communicated to all staff and contractors working for Hydro Tasmania. HSE policy is also made available to the public via our external web sites.
Understanding our legal and other obligations allows management to ensure the activities of Hydro Tasmania, our contractors and visitors comply with business HSE requirements.

2.1. The HSE Management System, including our policies, elements, procedures, and plans must deliver compliance with the legal requirements that are relevant to the particular activities and place of operation.

2.2. In order to ensure compliance with legal and other requirements, Hydro Tasmania:

2.2.a. identifies and accesses applicable laws, regulations, approvals, licences, agreements and permits;

2.2.b. has a process for tracking them for currency and relevance;

2.2.c. ensures they are covered by the HSE Management System; and

2.2.d. implements processes to check that requirements are being met.

2.3. Hydro Tasmania recognises a fundamental duty of care to our employees and members of the community who may be impacted by our operations. Our OH&S Commitment statement underpins our Duty of Care principles.

2.4. In addition to these laws, regulations, approvals, licences, agreements, and permits, Hydro Tasmania requires that all work aligns with Hydro Tasmania’s Cardinal Rules, Values, Code of Conduct, and Sustainability Code.
Hydro Tasmania establishes, implements, and maintains procedures for ongoing identification of HSE hazards, assessment of risks, and determination and implementation of necessary controls.

3.1. HSE risk management processes are applied to activities that Hydro Tasmania controls or can influence at both the broader business level and at the level of specific operational activities.

3.2. HSE hazard identification and risk assessment, including development and implementation of applicable controls, is completed by each line of business within Hydro Tasmania (strategic assessments), and for operational activities (operational assessments). This includes assessment, prioritisation and management, as appropriate, of the nature, scale and potential HSE impacts of activities.

3.3. Hydro Tasmania’s methods for HSE hazard identification and risk assessment:

3.3.a. are proactive;

3.3.b. provide the identification, prioritisation, assessment, and documentation of risks; and

3.3.c. determine the controls appropriate to manage assessed risks.

3.4. The HSE hazard identification and risk assessment process and identification and implementation of suitable controls, involve people with relevant competence, including employees, contractors and other stakeholders as appropriate.

3.5. Risk management decisions are documented and the implementation of resulting actions tracked. Implemented risk controls are reviewed to ensure that the:

3.5.a. risk has been reduced to an acceptable level;

3.5.b. controls have not introduced new, unintended hazards; and

3.5.c. controls are effective in achieving objectives.
Hydro Tasmania sets objectives and targets, and derives control actions from risk assessment, to drive and measure continual improvement in managing HSE hazards.

4.1. Hydro Tasmania carries out its planning and activities in a manner consistent with its values. Key features of these values are defined in Hydro Tasmania’s OH&S Policy, Environment Policy, and Sustainability Code.

4.2. Planning activities at all levels of Hydro Tasmania include HSE considerations.

4.3. Strategic planning sets objectives for a number of HSE measures including both proactive (lead) and reactive (lag) measures. These performance indicators are measurable, documented, communicated, monitored and reviewed. They are consistent with the HSE-related policies and consider the interests of stakeholders.

4.4. Strategic HSE plans and programs are developed and maintained. The plans identify specific objectives and the detailed process to achieve objectives.

4.5. Programs are developed and implemented where there is a need to coordinate a set of related activities or projects in order to achieve Hydro Tasmania’s strategic objectives.

4.6. Operational objectives and targets are established in line with Hydro Tasmania strategy.

4.7. Plans are developed and implemented to achieve the operational HSE objectives and targets.

4.8. HSE programs and improvement plans are regularly monitored and updated to ensure that appropriate progress is achieved.
Throughout Hydro Tasmania, accountabilities, roles, responsibilities and authorities relating to HSE are clearly defined, documented, communicated and understood.

5.1. The CEO of Hydro Tasmania is ultimately responsible for the HSE performance of the business, including the effective implementation of HSE policy.

5.2. At every level of the organisation, line managers are responsible for implementing and monitoring the HSE Management System.

5.3. The role of Level 1 Managers includes responsibilities as Officers (as defined by Workplace Health & Safety model legislation) for their respective areas.

5.4. Those working for Hydro Tasmania are responsible for the HSE implications of their own actions, and have a duty to carry out their work in a manner which does not create a risk to themselves, others, or the environment.

5.5. HSE risks are assessed and managed where there are changes to organisational structure and roles and responsibilities, including temporary assignments.

5.6. Personal HSE objectives are set as a component of the performance review process.

5.7. Anyone has the right and the responsibility to stop work or refuse to work in situations that may cause HSE harm, and bring these situations to the attention of those at imminent risk and to the attention of management.
Hydro Tasmania ensures that any person under its control who performs tasks that may impact on HSE, is competent on the basis of appropriate education, training, or experience.

6.1. Hydro Tasmania identifies training and competency requirements associated with its HSE risks and the HSE Management System.

6.2. Position descriptions define a 'snapshot' of qualifications and required experience at the point of entry to Hydro Tasmania. These position descriptions are based on the activities undertaken and the relevant competencies to perform them. Revised competencies and training needs are identified during the performance review process and captured in individual performance development plans.

6.3. Hydro Tasmania establishes, implements and maintains procedures to ensure awareness of:
   6.3.a. expected HSE behaviours (for employees, contractors, and visitors);
   6.3.b. the actual or potential HSE consequences of their work activities, their behaviour, and the HSE benefits of improved personal performance;
   6.3.c. roles and responsibilities and importance in achieving conformance to HSE policies and procedures, and to the requirements of the HSE management system; and
   6.3.d. the potential consequences of departure from specified procedures.

6.4. HSE training programs are developed and maintained. The programs:
   6.4.a. are based on training needs analysis of HSE requirements;
   6.4.b. provide appropriate delivery methods to cater to varying work situations;
   6.4.c. cover employees and contractors, as indicated by need;
   6.4.d. include evaluation of effectiveness of training; and
   6.4.e. maintain records of training and competency.

6.5. Training programs take into account differing levels of authority, responsibility, ability, language skills, literacy and risk.

6.6. Visitors to Hydro Tasmania’s sites receive HSE induction appropriate to the nature of their visit and the site hazards to which they may be exposed. Conformance with the HSE requirements included in the induction constitutes a condition of entering or remaining on Hydro Tasmania property.

6.7. HSE training records are retained as per the requirements of Element 8: Document & Record Management.
The involvement and active participation of management, employees, contractors and stakeholders is essential in achieving Hydro Tasmania’s HSE objectives.

7.1. Consultative arrangements are in place to provide employees, contractors and external stakeholders with an opportunity to contribute to HSE decision-making.

7.2. With regard to its HSE Management System, Hydro Tasmania has established, implemented and maintains procedures for:
   7.2.a. internal communication among the various levels and functions of the organisation;
   7.2.b. communication with contractors and other visitors to the workplace; and
   7.2.c. receiving, documenting and responding to relevant communications from external interested parties including stakeholders.

7.3. Hydro Tasmania has established, implemented and maintains procedures and programs for the participation of employees and contractors by their:
   7.3.a. appropriate involvement in hazard identification, risk assessments, and determination of controls;
   7.3.b. appropriate involvement in incident investigation;
   7.3.c. involvement in the development and review of HSE policies, objectives, and work practices; and
   7.3.d. consultation and representation on HSE matters.

7.4. Employees are informed about their participation arrangements, including who their representatives are on HSE matters. Contractors are informed, and are consulted where there are changes to the HSE Management System that affect them.

7.5. Hydro Tasmania endeavours to consult relevant internal and external stakeholders on pertinent HSE matters.

7.6. HSE reporting is included in the Hydro Tasmania Annual Report and conforms to GRI guidelines.
Hydro Tasmania’s HSE Management System documentation is controlled and managed to ensure currency and relevance. Record management requirements are set for the HSE Management System.

8.1. Hydro Tasmania ensures documentation that outlines or describes HSE activities is in place and kept up to date. Activities are identified through the hazard identification and risk management process.

8.2. HSE Management System documentation includes policies, procedures, manuals, reference documents, plans, registers and forms.

8.3. HSE Management System documentation is identified, securely stored, readily retrievable, and has established associated retention review and archive periods. Documentation may be stored electronically.

8.4. HSE documents have a nominated custodian responsible for the management of documents. This includes reviewing and updating of documents to ensure currency of information.

8.5. A process is implemented to manage changes affecting HSE Management System documentation.

8.6. Hydro Tasmania ensures a system is in place which maintains relevant HSE records.

8.7. HSE records must be accurate, identifiable, legible and retrievable.

8.8. Records are kept in accordance with the Hydro Tasmania Record Retention and Disposal Schedule.
Our asset operation, maintenance, inspection and testing is managed so that HSE risks are identified, assessed, managed and controlled.

9.1. Hydro Tasmania identifies and controls those operations and activities that have associated hazards in order to manage HSE risks.

9.2. Asset management processes ensure that when assets are modified, upgraded or maintained (including when assets are acquired or sold) that may involve HSE risks, these risks are identified and managed.

9.3. People operating and maintaining equipment are suitably competent and, where applicable, hold relevant formal qualifications.

9.4. Systems are established, documented and maintained to ensure the ongoing integrity and safety of plant and equipment. These:
   9.4.a. include procedures for maintenance, inspection, testing, calibration and certification of equipment; and
   9.4.b. are applied at frequencies appropriate for the level of risk associated with the equipment, and legal and/or manufacturer’s requirements.

9.5. Equipment that is newly installed, or is returned to service following maintenance or modification, is subject to inspection and testing prior to being returned to service to ensure that operational integrity is maintained.

9.6. The frequency of scheduled maintenance, inspections, checks, tests and calibration is determined with consideration of the level of risk associated with the equipment and recognised industry elements and/or manufacturer’s or other requirements.
Assessment and management of HSE risks is an integral part of all phases of project work, including design, construction and decommissioning.

10.1. Projects are activities with a predetermined time frame. Their unique character may introduce new hazards and risks into the workplace, which requires planning to ensure risks are controlled.

10.2. In order to identify the specific HSE hazards, as well as assess and control the HSE-related risks, Hydro Tasmania ensures that its project management systems and practices include consideration, consultation, documentation and communication of HSE aspects in all phases of project work: business case; design; procurement; site works; commissioning; decommissioning; finalisation; and close out.

10.3. Technical elements for design, construction and commissioning (including any modifications) are compliant with legislation and relevant industry codes and elements. Sound engineering practices and risk management principles are utilised (e.g., quantified risk assessment, HAZOPS, and HSE reviews).

10.4. Project plans consider HSE issues and incorporate controls establishing technical integrity and HSE specifications. HSE requirements are established, documented and understood.

10.5. Design reviews for construction, operation and maintenance of plant, equipment, and systems ensure that HSE risks are identified, addressed and documented.

10.6. Hydro Tasmania implements and maintains controls related to purchased goods, equipment and services for project related work.
Contractors & suppliers to our workplace align their HSE culture to ours. Aligning with our way of doing things is aimed at preventing harm to personnel, members of the public, the environment and Hydro Tasmania’s business interests and reputation.

11.1. Hydro Tasmania maintains criteria for contractors and suppliers to check that their HSE systems, capability, experience, equipment, materials, products, plans, and/or services align with Hydro Tasmania’s HSE requirements.

11.2. Hydro Tasmania ensures appropriate consultation, communication and agreement takes place regarding the identification and control of HSE risks from specification through to completion of the works.

11.3. Hydro Tasmania ensures that the scope, specifications and site boundaries for the work are clear and agreed.

11.4. Hydro Tasmania ensures that actions to control HSE risks associated with the work being done by contractors on Hydro Tasmania-controlled sites are identified and agreed.

11.5. Hydro Tasmania ensures that work on plant and/or assets by contractors meets contract requirements.

11.6. Contractors are not permitted to subcontract work to other contractors without prior approval from Hydro Tasmania.
Plans and procedures are in place to respond to foreseeable emergencies in order to minimise any adverse impact on the health or safety of people or the environment.

12.1. Hydro Tasmania maintains a system to identify potential emergency situations.

12.2. Emergency response priorities are considered in the following order:
   12.2.a. health and safety of people; then
   12.2.b. protection of the environment; then
   12.2.c. preservation of reputation and operability of Hydro Tasmania; then
   12.2.d. financial risk.

12.3. Hydro Tasmania commits resources and funding necessary to develop and implement appropriate emergency preparedness programs.

12.4. Specific emergency response plans are developed and maintained for Hydro Tasmania operating sites and/or premises. These plans provide instructions to manage an emergency, and establish roles and accountabilities for emergency response tasks. Training is provided to staff and contractors.

12.5. Emergency response plans include management of incident communications, notification and reporting to both internal and external stakeholders.

12.6. These plans are tested and reviewed. Plans incorporate improvements based on findings from post-emergency events, exercises and drills.

12.7. Hydro Tasmania procures and maintains emergency plant and equipment and establishes emergency control centres.

12.8. Hydro Tasmania establishes and maintains working relationships with outside agencies identified in emergency response plans (e.g., Fire Service) and, where possible, participates in external emergency planning exercises.
Monitoring programs are established and maintained to measure aspects of our activities that may impact HSE.

13.1. Hydro Tasmania establishes, implements and maintains procedures to monitor and measure HSE performance on a planned basis. These procedures provide:
   13.1.a. both qualitative and quantitative measures appropriate to the needs of Hydro Tasmania;
   13.1.b. monitoring of the effectiveness of HSE controls; and
   13.1.c. the extent to which Hydro Tasmania’s HSE objectives are achieved.

13.2. The monitoring and measuring programs to be implemented are risk-assessed to determine whether new risks to Hydro Tasmania will be introduced as a result of their implementation. Where risks are identified, appropriate control actions are incorporated into the monitoring and measuring programs.

13.3. Measures are both reactive and proactive, with the primary focus on proactive measures, in order to drive HSE performance improvement and injury and/or environmental impact reduction.

13.4. Systems are in place to identify, report, respond to and manage non-conformances and improvement opportunities.

13.5. Systems are established to ensure the appropriate reporting of HSE performance to relevant authorities and other stakeholders as required by legislation or other commitments.

13.6. Where equipment is required to monitor or measure HSE performance, Hydro Tasmania establishes and maintains procedures for the checking, calibration and maintenance of such equipment. Records of checking, calibration and maintenance activities and results are retained.
HSE incidents, including near misses, are reported, investigated and analysed. Management of incidents and near misses involves taking remedial and corrective actions and identifying opportunities for HSE Management System improvement.

14.1. Systems are in place for timely reporting, investigation and appropriate communication of HSE incidents, hazards and near-miss events.

14.2. HSE incidents include those with health, safety, regulatory, environment and/or community impact. This includes improvement notices, fines, prosecutions, community complaints and social or cultural heritage disturbance.

14.3. Hydro Tasmania promotes reporting “near misses” as a desired HSE behaviour.

14.4. Management clearly defines accountability for incident management and ensures it is adequately resourced (including provision of relevant training for the required roles).

14.5. Hydro Tasmania establishes, implements and maintains procedures to:
   14.5.a. record, investigate and analyse HSE incidents in a timely manner;
   14.5.b. determine underlying HSE deficiencies and other factors that might be causing or contributing to the occurrence of incidents;
   14.5.c. identify the need for remedial/corrective and/or preventive action;
   14.5.d. identify opportunities for continual improvement; and
   14.5.e. communicate the results of such investigations.

14.6. An incident may have multiple HSE impacts. Each impact is assessed and investigated independently. The most significant impact classification is recorded as the main rating of the incident.

14.7. Hydro Tasmania ensures an injury management process is in place (i.e., Return to Work program) to facilitate effective rehabilitation of injured employees and/or environmental sites.
HSE systems, including plans, are monitored and evaluated to identify trends, measure progress, assess conformance and drive continual improvement.

15.1. Audits provide a formal method of assessing our conformance with the HSE Management System and plans, and compliance with legal and other requirements, measured against Hydro Tasmania’s objectives and key performance measures.

15.2. Audits are conducted with appropriate objectivity and impartiality. Auditors hold the required competency to lead or participate in audits.

15.3. Procedures are in place to define the process to plan and conduct HSE audits and evaluate HSE performance. This process gives consideration to the level of HSE risk, the identification of non-conformances, hazards, compliance with legal and other requirements, and previous audit and inspection results.

15.4. Audit plans are developed and prioritised on risk. Every element of the HSE Management System is audited at least once over a three-year period.

15.5. Procedures are in place to identify report, respond to, and manage non-conformances and improvement opportunities.

15.6. Non-conformances are investigated, then remedial, corrective, and/or preventive actions implemented and their effectiveness reviewed.

15.7. Audits recognise good performance where appropriate.

15.8. Once appropriate initial responses have been taken, responsible managers issue notifications and initiate investigation of non-conformances.
The overall effectiveness of the HSE Management System is assessed by Hydro Tasmania to ensure that its suitability, adequacy and effectiveness continue to meet our ongoing HSE requirements.

16.1. There is an annual or event-based management review for the HSE Management System. These reviews are conducted by the Executive Leadership Team to determine the continuing adequacy, suitability and effectiveness of the system. This includes review of audit results, incident reports, performance reports, and relevant input from stakeholders, including annual staff survey results.

16.2. The review establishes performance against objectives and associated measures, and establishes objectives and targets for the next year.

16.3. The review is documented. This includes observations, conclusions, recommendations, actions and follow-up requirements. An action register is used to manage the review outputs and to assign management responsibility.

16.4. Findings from the review are used to set Hydro Tasmania’s HSE objectives to drive continual improvement.

16.5. A monthly report of the HSE Management System encompasses a summary, including:
   16.5.a. injury trend analysis;
   16.5.b. high potential HSE incidents;
   16.5.c. HSE audit findings;
   16.5.d. non-conformance reports; and
   16.5.e. awards and achievements.
   This report is sent to and discussed at the executive level.

16.6. Information gathered from non-conformance and incident investigation is analysed to identify lessons and monitor trends. This information is reviewed in order to improve elements, systems and practices. Learnings are shared across Hydro Tasmania, and with external stakeholders as appropriate.

16.7. Relevant messages from reviews and reports are made available for communication throughout the business.
Glossary

**Hydro Tasmania:** Refers to the Hydro Tasmania Group, comprising Hydro Tasmania, Entura and Momentum Energy.

**Audit:** Systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.

**Communication:** The flow of information between people.

**Compliance:** Ensuring that the requirements of laws, regulations, industry codes and organisational standards are met.

**Conformance:** Ensuring the requirements of the HSE Management System are met, including responsibilities to ensure health, safety and environmentally acceptable outcomes and to meet legal compliance requirements.

**Continual improvement:** Recurring process of enhancing the HSE Management System in order to achieve improvements in overall HSE performance, consistent with the organisation’s policy.

**Contractor:** Any individual or organisation, including suppliers, contract staff and technical specialists, or any organisation or person providing materials or services to the Hydro Tasmania Group, who are not employees, and contribute to our service for a client. ‘Contractor’ also includes Entura staff in their capacity as service providers.

**Corrective action:** Action to eliminate the cause of a detected non-conformance.

**Document:** Information and its supporting medium (paper, electronic, photograph, etc.) that may be subject to change.

**Documentation:** Combined set of documents and records.

**Emergency response plan:** Describes how a specific emergency at a particular site will be combated. It includes specific information and detailed procedures or guidelines for responding to damaging events.
**Employee:** A person employed directly by the organisation and on Hydro Tasmania Group’s staff payroll, on a full-time permanent, full-time temporary, part-time, or casual basis.

**Hydro Tasmania Group:** The Hydro Tasmania corporation, including Hydro Tasmania, Entura, Momentum and Hydro Tasmania Wind Operations.


**Management system:** A set of interrelated elements used to establish policy and objectives and to achieve those objectives.

**Non-conformance:** Non-fulfilment of a requirement.

**Objective:** Overall goal, consistent with policy, that an organisation sets itself to achieve.

**OHSAS 18001:** BSI British Standard – Occupational Health and Safety Management Systems.

**Policy:** Overall intentions and direction of an organisation related to its performance as formally expressed by top management.

**Preventive action:** An action to eliminate the cause of a potential non-conformance.

**Procedure:** A documented process.

**Process:** Specified way to carry out an activity or process.

**Record:** A document stating results achieved or providing evidence of activities performed.

**Regulatory requirements:** The requirements of all binding laws, regulations, policies and plans established by federal, state or local government authorities, as interpreted through case law and as amended from time to time.

**Remedial action:** Initial action to remedy a non-conformance.

**Risk assessment:** The overall process of risk identification, risk analysis and risk evaluation.
Risk: The chance of something happening that will have an impact on objectives. Risk may have a positive or negative impact and is often specified in terms of an event or circumstances and the consequences that may flow from it.

Stakeholder: An employee or external person or group of persons who affect and/or could be affected by an organisation’s activities, products or services and associated performance. Stakeholders do not include all those who may have knowledge of or views about the organisation.
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