

HSES1801 Public Safety Management Standard

December 2016

1 DOCUMENT CONTROL

Document Information

	Information
Document ID	HSES1801 – Public Safety Management Standard
Document Administrator	Alison Howman
Document Name	Public Safety Management Standard
Issue Date	December 2016

Document History

Rev No	Date	Description	Approved by
1	07/12/2016	Hydro Tasmania's Public Safety Management Standard has been developed to ensure Hydro Tasmania fulfils its duty of care to all persons who access Hydro Tasmania land and water, and is in compliance with the <i>Civil Liability Act 2002</i> .	Donna Brown

Document Change Summary

Date	Section	Change Description
07/12/2016	All	This version shall be considered as a new document and the first version of the Public Safety Management Standard.

Document Approvals

Role	Name	Signature	Date
Manager: Environment Health and Safety	Donna Brown		22/12/16

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1. Purpose

Hydro Tasmania both owns and has varying degrees of management control over significant land and water assets in Tasmania. Those land and water assets comprise core power generation assets and land not directly associated with power generation.

Effectively discharging its duty of care to the public and managing civil liability risks on land and water under its control is a priority for Hydro Tasmania. In order for Hydro Tasmania to avail itself of statutory protection, under civil liabilities legislation, the Corporation needs to have a well-documented, communicated public safety management process for categorising and managing the risks which is implemented and regularly reviewed.

This document provides the legal context and corporate commitments relating to Hydro Tasmania's management of land and associated public use. It outlines the framework for the development and implementation of a Public Safety Management Standard (PSMS) focused on the assessment and management of risk to the public accessing the land, water and assets under Hydro Tasmania's ownership and control¹, particularly for recreational purposes.

Safety of workers under direct or indirect employment of Hydro Tasmania and/or contractors to Hydro Tasmania is managed separately under the *Workplace Health and Safety Act 2012*. Although there are separate processes, legal context and standards to address health and safety risks relating to the workplace, the principles of risk based management and risk minimisation are common to both workplace health and safety and public safety.

2. Hydro Tasmania's Land and Water Ownership

Hydro Tasmania is the largest water manager in Australia with freehold (79,945 hectares - ha) and vested land, including water, covering approximately 110,000 ha. Approximately 71,000 ha of the total land area are under water and around the edges of lakes, with the remaining located above the Design Flood Level (DFL) of lakes and other assets. Approximately 12,000 ha of this land is Tasmanian Wilderness World Heritage Area (TWWHA).

Hydro Tasmania's hydropower portfolio comprises over 50 major lakes, 200 dams and 30 power stations. While Hydro Tasmania does not own all of the water bodies, with some or parts of lakes currently owned by the Crown or under private ownership, Hydro Tasmania does exercise a degree of control and management over the water storages and water conveyances.

Hydro Tasmania's assets include:

- dams, weirs, spillways and diversion structures;

¹ This includes land and/or assets vested in Hydro Tasmania.

- intakes and water controls;
- canals and flumes;
- pipelines and penstocks;
- outlets and tailraces;
- power station buildings;
- switchyards;
- pump stations;
- high voltage feeders;
- hill-top valve houses;
- wind farm infrastructure;
- diesel generating plants;
- hydrographic stations;
- roads and bridges;
- offices and buildings;
- public facilities, amenities, signs, camp grounds, boat ramps, pontoons;
- lakes, lagoons and ponds;
- properties;
- quarries; and
- heritage huts and buildings.

While some assets used for power generation are excluded for public use unless specifically invited and accompanied by Hydro Tasmania personnel, much of the land and water resource immediately proximal to generation and ancillary assets is freely accessible to the public and is used for commercial and recreational purposes. A broad range of public recreational and public use activities are undertaken on Hydro Tasmania land (Appendix A) highlighting the value placed on these assets by the public.

It should be noted that Hydro Tasmania also has a number of generation assets on land not owned or managed by Hydro Tasmania, e.g. dams, canals and monitoring stations on land managed by the Tasmania Parks and Wildlife Service (PWS) or Forestry Tasmania, that Hydro Tasmania controls and is responsible for public safety associated with the assets.

For the purposes of the PSMS the term 'Hydro Tasmania land' will refer to both land and water owned by Hydro Tasmania and third party land where Hydro Tasmania has control over electricity infrastructure.

3. Legal Context

3.1 Hydro Tasmania's Functions

Hydro Tasmania is Australia's leading renewable energy business. The Corporation generates hydropower, gas and wind power in Tasmania and trades electricity, energy products and energy-related environmental products (such as Renewable Energy Certificates) in the Australian National Electricity Market. Hydro Tasmania is a Government Business Enterprise, the functions of which are to:

- generate electricity and to do all things necessary for, or related to, the generation of electricity;
- to retail electricity in Victoria; and
- to perform other functions as agreed between the Corporation and the Minister.

3.2 Ministerial Charter

The Corporations' [*Ministerial Charter \(November 2012\)*](#)² establishes Hydro Tasmania's principle purpose as being the efficient generation, trade and sale of electricity in the National Electricity Market. In undertaking its core business, Hydro Tasmania's function is to, inter alia:

- efficiently manage and maintain its core assets;
 - manage financial performance and business risk, including periodic external reviews of Hydro Tasmania's risk policy and risk management framework;
- 'act in a socially responsible manner and take all reasonable steps to reduce the risk of adverse effects on the environment that may result from Hydro Tasmania's activities'. Furthermore, 'Hydro Tasmania must have regard to the financial merits of any initiatives from the view of the State, including the extent of the financial risks to which the State's balance sheet is exposed'³.

Hydro Tasmania is not aware of any Tasmanian Government policy or guideline relating to the provision of public access to land, or the explicit support of public or commercial recreational opportunities on Hydro Tasmania assets, that bind the Corporation under the Ministerial Charter⁴.

The Ministerial Charter also provides that Hydro Tasmania's non-commercial activities are:

- any activity that has been declared a community service obligation by the Treasurer; and
- any activity that the Portfolio Minister and the Treasurer agree would be non-commercial and direct Hydro Tasmania to perform.

² Established under the *Government Business Enterprises Act 1995*

³ Ministerial Charter, clause 2

⁴ Ministerial Charter, clause 2.5

Currently, Hydro Tasmania's only non-commercial activity is the provision of subsidised electricity to King and Flinders Islands.

In relation to financial performance, Hydro Tasmania is expected to be proactive in identifying and implementing operational efficiencies and productivity measures to enhance financial performance⁵.

In relation to asset management, Hydro Tasmania is expected to:

- develop Asset Management Plans reflecting prudent commercial practice; and
- regularly review its asset holdings with the aim of identifying surplus non-performing and non-core assets⁶.

In relation to risk management, Hydro Tasmania is expected to have in place risk management strategies that recognise the Government is a long-term risk-adverse investor, identify business and financial risks, and provide for their ongoing management.⁷ This Standard addresses the specific area of risk associated with the safety of the public on Hydro Tasmania land.

3.3 Water Management Act 1999

By virtue of the [Water Management Act 1999](#) (WMA), Hydro Tasmania holds a Special Water Licence which entitles the Corporation to take water from a large number of water catchments across the State for the purposes of generating electricity. Hydro Tasmania is obliged to perform any function or exercise the power conferred upon it under the WMA in such a manner as to further the objectives of the States Resource Management and Planning System and the specific objectives of the WMA (Section 6) which include to:

- a. promote sustainable use and facilitate economic development of water resources;
- b. recognise and foster the significant social and economic benefits resulting from the sustainable use and development of water resources for the generation of hydro-electricity and for the supply of water for human consumption and commercial activities dependent on water; and
- c. provide for the fair, orderly and efficient allocation of water resources to meet the community's needs.

3.4 Tasmanian Wilderness World Heritage Area Managing Authority

Hydro Tasmania is responsible for the management of land within and adjacent to the TWWHA and there is an expectation expressed within the [Draft TWWHA Management Plan 2014](#) that:

⁵ Ministerial Charter, clause 4.1

⁶ Ministerial Charter, clause 4.6

⁷ Ministerial Charter, clause 4.7

- Land vested in Hydro Tasmania with the TWWHA's Conservation Areas are administered and managed in ways that are consistent with the *Nature Conservation Act 2002* and the *National Parks and Reserves Management Act 2002*⁸.
- Lands adjacent to the TWWHA are managed in a fashion that is cognisant of the TWWHA values and management plan.

3.5 Civil Liability Act 2002 (Tas)

Hydro Tasmania is exposed to legal action, or the threat of legal action, as a result of the public suffering a loss in the course of undertaking recreational pursuits and activities on Hydro Tasmania land.

The [*Civil Liability Act 2002*](#) (Tas) (the Act) regulates civil liability for damages or harm resulting from breach of duty of care (except civil liability arising from motor accident claims or workers compensation claims).

The Act limits the ability of the public to make claims against statutory authorities under some circumstances. While the Act may limit the liability of Hydro Tasmania, it does not eliminate it. Further relevant sections of the Act are provided in Appendix B.

3.5.1 Obvious Risks

The Act provides that Hydro Tasmania does not have a proactive duty to warn of 'obvious risks'⁹. An 'obvious risk' is a risk that, in the circumstances, would have been obvious to a reasonable person. Obvious risks include risks that are patent or a matter of common knowledge. A risk of something occurring can be an obvious risk even though it has a low probability of occurring. A risk can be an obvious risk even if the risk (or a condition or circumstance that gives rise to the risk) is not prominent, conspicuous or physically observable. A risk is not an obvious risk merely because a warning about the risk has been given¹⁰.

3.5.2 Recreational Activities and Risk Warnings

Importantly, Section 39 of the Act provides that an authority 'does not owe a duty to a person who engages in a recreational activity to take care in respect of a risk of the activity if the risk was the subject of a risk warning to that person'. For the purposes of the Act, a 'recreational activity' includes any sport (whether or not the sport is an organised activity); and any pursuit or activity engaged in for enjoyment, relaxation or leisure.

According to the *Civil Liability Act 2002* (Tas) a 'risk warning':

⁸ This means, in the case of Conservation Areas, that the land must be managed in a manner that is consistent with the "protection and maintenance of the natural and cultural values of the area of land and the sustainable use of the natural resources of that area of land including special species timber harvesting."

⁹ *Civil Liability Act 2002* (Tas) Section 17. The only exceptions being: if a member of the public has requested advice or information about the risk from Hydro Tasmania, or Hydro Tasmania is required by a written law to warn persons of the risk.

¹⁰ *Civil Liability Act 2002* (Tas) Section 15.

- [is] a warning that is given in a manner that is reasonably likely to result in people being warned of the risk before engaging in the recreational activity¹¹;
- can be given orally or in writing (including by means of a sign or otherwise)¹²; and
- need not be specific to the particular risk and can be a general warning of risks that include the particular risk concerned (so long as the risk warning warns of the general nature of the particular risk)¹³.

An authority is not required to establish that the person received or understood the warning or was capable of receiving or understanding the warning.

The Act limits the liability of Hydro Tasmania for harm suffered from people engaged in dangerous recreational activities where the risks are obvious¹⁴.

3.5.3 Dangerous Recreational Activities

Under the Act, Hydro Tasmania has no liability for harm suffered by another person as a result of the materialisation of an obvious risk of a dangerous recreational activity engaged in by the person (irrespective of whether the person was aware of the risk)¹⁵.

A 'dangerous recreational activity' means a recreational activity that involves a significant degree of risk of physical harm to a person¹⁶.

3.5.4 Insurance and Claims Management

As an important component of prudent risk management, Hydro Tasmania holds public liability insurance to protect the Corporation in the event of a claim by a third party for loss or damage suffered as a result of an incident on Hydro Tasmania land where Hydro Tasmania is found to be negligent.

3.6 Nature Conservation Act 2002 and the National Parks and Reserves Management Act 2002

Together the [Nature Conservation Act 2002](#) and the [National Parks and Reserves Management Act 2002](#) set the statutory foundation for the reservation and management of reserved land for conservation purposes. These Acts outline the purpose and objectives of those lands, and how they are to be administered and managed.

3.7 Tasmanian Dam Safety Legislation and Regulations

Dam safety in Tasmania is regulated by the [Water Management Act 1999](#) and the *Water Management (Safety of Dams) Regulations 2015*. The regulations set out the activities and reporting requirements for dam safety and incorporate the requirements of the Australian

¹¹ *Civil Liability Act 2002* (Tas) Section 39.3.

¹² *Civil Liability Act 2002* (Tas) Section 39.5.

¹³ *Civil Liability Act 2002* (Tas) Section 3.9.6.

¹⁴ *Civil Liability Act 2002* (Tas), Division 5.

¹⁵ *Civil Liability Act 2002* (Tas) Section 20.

¹⁶ A significant risk is different from a real risk; it embodies a standard between a trivial risk and a risk likely to materialise. The following have been found to be dangerous recreational activities: kangaroo shooting, motor bike riding; diving off a pylon into water of uncertain depth; and diving off a boat into water of uncertain depth.

Committee on Large Dams (ANCOLD). Hydro Tasmania's *Dam Safety Risk Management Standard May 2012* ensures compliance with Tasmanian Dam Safety legislation and ensures the Tasmanian community is not exposed to unacceptable risks from the existence or operation of Hydro Tasmania's dams.

3.8 Maritime and General Watercraft Legislation

The *Marine and Safety Authority Act 1997* established the statutory authority, Marine and Safety Tasmania (MAST), which has responsibility:

- To ensure the safe operation of vessels (including non-motorised watercraft such as canoes and sailing boats) in all Tasmanian waters including all inland lakes, rivers and streams;
- To provide and manage marine facilities; and
- To manage environmental issues relating to vessels.

The *Marine and Safety (Motor Boats and Licence) By-laws 2013* restrict vessels from operating in certain areas due to hazards and include designated areas upstream and downstream of Hydro Tasmania dam assets.

Hydro Tasmania intends to commence discussions with MAST regarding formalising, in an agreement or MOU, our respective roles and responsibilities relating to infrastructure planning (principally jetties and boat ramps), enforcement and financing and responsibilities associated with infrastructure maintenance.

3.9 Workplace Health and Safety

The state legislation dealing with workplace health and safety (WHS) in Tasmania is the *Work Health and Safety Act 2012* (Tas). Under that Act, Hydro Tasmania has obligations to ensure the health, safety and welfare of employees and contractors as well as persons other than employees and contractors at a workplace¹⁷.

Visitors to 'workplaces' as defined under the *Work Health and Safety Act 2012* (Tas) or non-public sites are dealt with under the Hydro Tasmania's Health Safety and Environment (HSE) policies and procedures.

3.10 Tasmanian Building Legislation

The principal law related to the safe construction and maintenance of buildings in Tasmania is the *Building Act 2000* (Tas). This Act outlines the requirements for owners and occupiers around required maintenance of essential health and safety or other prescribed equipment including minimum standards and maintenance intervals. Generally these requirements are more stringent for buildings designed for public assembly, however, the Act does not normally differentiate between visitors and normal occupants.

Much of Hydro Tasmania's civil generation infrastructure is in the public domain. Where there are access structures (footbridges, tracks, stairs, platforms, ladders etc.) in places that

¹⁷ A workplace is a place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. *Workplace Health and Safety Act 2015* (Tas), Division 1, Section 8.

are publically accessible, risk exposure is defined and addressed by use of the National Safety Council of Australia Risk Tool. These risks, when identified, are recorded on a risk register and a risk prioritised mitigation programme is in place which aims to drive an “As Low As Reasonably Practicable (ALARP)” Risk Position. Risk exposure in this instance considers both WHS risk and public safety risk and the mitigations are targeted to address both exposures simultaneously. An asset type management plan describing these processes is currently being drafted for the Bridges and Access-ways Asset Portfolio and will be finalised in late 2016.

3.11 Legal Responsibilities and the Public

Whilst the **public do not have a legal ‘right’ to access Hydro Tasmania land**, in practice, the public are invited to, and extensively utilise land and water managed by the Corporation. Similarly, the Corporation **does not have any legal duty to provide or manage its assets for the purposes of public recreation**. Hydro Tasmania does however have the **right to exclude the public from entering its land**¹⁸, and does so for reasons of safety, asset security or to protect a range of other natural or cultural values. Given the number, size and geographic spread of the infrastructure, land and water assets for which it is responsible, **it is not feasible for Hydro Tasmania to physically control public access to Hydro Tasmania land**. Moreover, it is beyond practicality and the financial resources of Hydro Tasmania to regularly inspect and control all areas used by the public.

The Corporation owes a **duty to take reasonable care to all persons who could reasonably be expected to access Hydro Tasmania land**. Importantly, the *Civil Liability Act 2002* (Tas) recognises that the standard of care a statutory authority (such as Hydro Tasmania) owes to the public, in relation to a foreseeable risk of harm, will be influenced by what reasonable precautions could have been taken and the burden of taking those precautions. In assessing the reasonableness of an authority’s response, the fact that it has limited financial and other resources available to undertake its functions is relevant. To enable Hydro Tasmania to effectively discharge its duty of care, it is **critical that all hazardous situations are assessed** in a systematic way to determine the level of risk and to enable control actions to be prioritised so that limited resources can be allocated accordingly.

The following factors are relevant to any consideration of Hydro Tasmania’s duty of care to the public on Hydro Tasmania land:

- elements of risk will always be present;
- the perception of risk, and the level of risk accepted for an activity, is a personal choice that is influenced by cultural background, knowledge, experience, skill and tendency towards foolishness or caution;
- outdoor leisure, recreation and land use activities can be, by their nature, inherently dangerous; and
- provision of assets is complemented by a duty of care for their management.

¹⁸ Except where legal rights of access have been granted to third parties.

In the context of the management of risk, **the more an area is promoted for recreation the greater level of invitation and the higher Hydro Tasmania's duty of care for people visiting those areas.**

4. Corporate Commitments

4.1 Hydro Tasmania Vision, Values, Health Safety and Wellbeing Policy, and Sustainability Code

Hydro Tasmania's vision is to be Australia's leading clean energy business inspiring pride and building value for our owners, our customers and our people.

Our values guide our behaviour, how we interact and how we make decisions.

- We put people's health and **safety** first;
- We build value for our partners and customers through **innovation** and outstanding service;
- We behave with honesty and **integrity**;
- We work together, **respect** each other and value our diversity;
- We are **accountable** for our actions;
- We are committed to creating a **sustainable** future.

Hydro Tasmania's Health Safety and Wellbeing Policy is provided in Appendix C.

Hydro Tasmania's Sustainability Code is provided in Appendix D.

4.2 Recreation Principles

Hydro Tasmania adopted key recreation principles to guide Hydro Tasmania's planning, development and management of recreation opportunities on its land and water bodies. A copy of Hydro Tasmania's current Recreational Principles is set out in Appendix E.

4.3 Commercial Arrangements for Use of Land or Water

A number of commercial operators are authorised to provide recreational opportunities and services to members of the public on Hydro Tasmania land. As such, Hydro Tasmania establishes a formal contract, either a lease or licence, with all commercial operators. The contract documentation requires that operators are responsible for client safety and must demonstrate an ability to do so, including a requirement to hold current Public Liability Insurance. This is a standard approach to dealing with commercial activities on Hydro Tasmania land.

Commercial use of Hydro Tasmania land for non-recreational purposes, including but not limited to bee-keeping, grazing, eel fishing and diving are subject to the same lease, licence and insurance provisions as those applying to commercial services.

Third party activities on Hydro Tasmania land are subject to a documented risk assessment process under Hydro Tasmania's Health Safety and Environment (HSE) system. An application process seeks to recover costs for the assessment and supervision of third party activities on our land.

4.4 Clubs and Incorporated Bodies

Where necessary Hydro Tasmania establishes a formal contract, either a lease or licence, with clubs and incorporated bodies seeking to use or occupy its land. The contract documentation requires that operators are responsible for client and public safety and must demonstrate an ability to do so. Clubs and incorporated bodies must hold current Public Liability Insurance of at least \$20 million.

4.5 Memorandum of Understanding

Hydro Tasmania and Inland Fisheries Service have entered into an Overarching Memorandum of Understanding to develop collaborative approaches to the management of inland waters associated with hydropower catchments in Tasmania. One component of the MOU includes integrated recreational planning, development and management to be achieved through the Boating Infrastructure Plan including signage and access infrastructure.

4.6 Recreation Opportunities and Public Access Statements

As previously stated (Section 3.11), there is no legal requirement for Hydro Tasmania to provide public access to its land. In the absence of clear Ministerial guidance regarding Hydro Tasmania's obligation to provide public access and facilities, it should be acknowledged that there are very diverse views both within the organisation and with external stakeholders as to the extent to which (and the level of expenditure) the Corporation should facilitate public access to non-generational assets.

Access to and use of Hydro Tasmania's assets is heavily influenced by the type of activities on the adjoining land, which is typically managed by the Tasmanian Parks and Wildlife Service, Forestry Tasmania, Municipal Councils, private land owners and others.

In practice the land and waterways managed by Hydro Tasmania provide important recreation opportunities for Tasmanians as well as visitors from interstate and overseas. The spectrum of recreation opportunities range from the undeveloped areas where people camp and fish, such as the shoreline of Lake Rowallan, to developed locations such as the Waddamana Museum. Members of the public participate in a range of recreation activities that can be influenced by Hydro Tasmania's operations, such as fishing, boating, rowing, skiing and kayaking.

Hydro Tasmania actively contributes to the community by:

- providing recreation infrastructure such as walking tracks, boat ramps, camping grounds, jetties and pontoons;
- providing museums, lookouts, information sites, memorials, monuments and picnic and recreation areas;
- releasing water for recreational use;

- maintaining public access roads; and
- granting leases and licences for commercial recreation providers.

Hydro Tasmania also promotes a range of recreation sites and historic sites via its website. In 2016, 46 boat ramps, 12 campsites and picnic grounds, and 21 historic interest or information sites were advertised on the website. Publicly, the Corporation's website states:

Hydro Tasmania has been a major part of the Tasmanian community for 100 years. We believe in playing an active part in the community both through philanthropy and by providing access to the magnificent assets that we manage. We work with the Tasmanian community to share and enjoy the assets that Hydro Tasmania manages, including land, water and cultural heritage.

5. The Public Safety Management Standard

5.1 Elements of the Public Safety Management Standard (PSMS)

This document provides the framework for the PSMS and its implementation and includes core elements which are conceptualised in Figure 1 and described in the following sections.

The Hydro Tasmania Public Safety Management Standard is focused on the management of public risk in non-workplace environments and is based on the application of ISO 31000: 2009 Risk management – Principles and Guidelines. To be in alignment with good practice and be consistent with other land managers, Hydro Tasmania's PSMS is based on the Tasmanian Parks and Wildlife Service's (TPWS) *Visitor Risk Management Policy*¹⁹, and has been informed by the Canadian Dam Association *Guidelines for Public Safety around Dams*²⁰.

¹⁹ Tasmanian Parks and Wildlife Service (2008). *Visitor Risk Management Policy*. TPWS P-002, June 2008. Department of Environment Heritage and the Arts, Hobart.

²⁰ Canadian Dam Association (2011). *Guidelines for Public Safety around Dams*. Canadian Dam Association, Toronto, Canada.

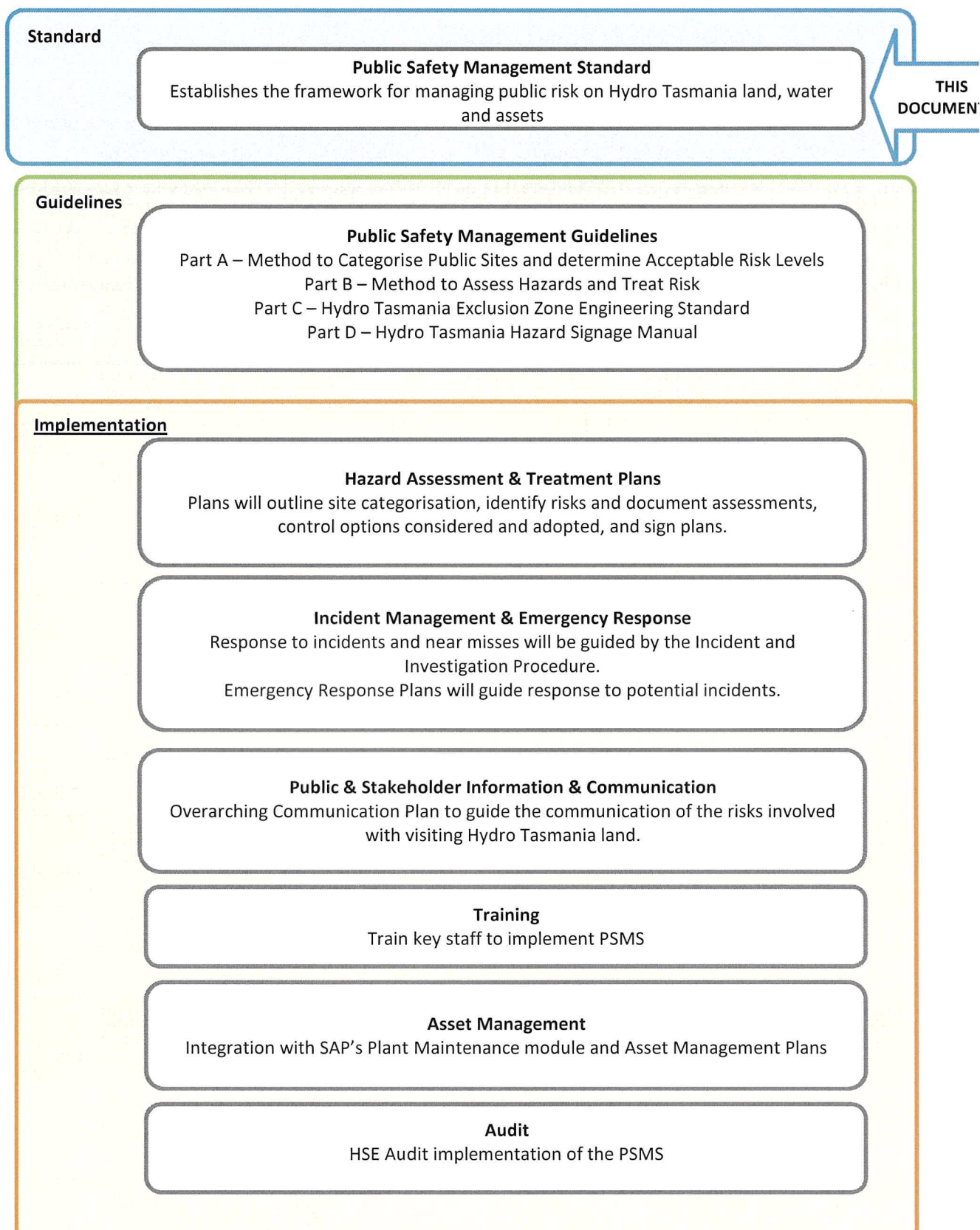


Figure 1 Conceptual map of elements of the Public Safety Management Standard (PSMS)

5.2 Exclusions from the PSMS

The PSMS does not cover:

- Road signage on publically accessible Hydro Tasmania owned/managed roads. The provision and maintenance of road signage on Hydro Tasmania owned/managed roads is covered by a state wide contract that requires the Contractor to ensure signage is compliant with the relevant Australian Standards.
- Dam safety: Hydro Tasmania Dam Safety Emergency Plan, Storage Operating Rules and Operations and Maintenance Manuals cover public safety with respect to operations and dam failure.
- Commercial operators who manage risk via contractual and licence arrangements until such time as their contract or licence expires.
- Workplace Health and Safety.
- Compliance and Maintenance of buildings that fall under the *Building Act 2000*.
- Buildings not covered by the *Building Act 2000* that would not normally be expected to be occupied or used by the public.

5.3 Invitation to the Public

Successful public risk management is a partnership between Hydro Tasmania and the users of its land and water. The use of Hydro Tasmania land arises from an invitation between the users and Hydro Tasmania and is communicated to the public through various means including: pre-visit information, websites, phone calls, hazard warning signs and other methods. In general the implied responsibilities are:

Hydro Tasmania responsibilities:

- Provision and maintenance of consistent recreational settings for existing sites and in the development of new facilities/services in accordance with the Public Safety Management Guidelines (PSMG).
- Provide information and advice to help the public select and plan recreational activities with safety in mind through the provision of pre-visit information (e.g. website/s, brochures) and signage.
- Identifying, and where possible controlling, hazards that pose a level of risk that is inconsistent with the recreational experience on offer.
- Be prepared to respond appropriately to situations that pose an unacceptable risk to public safety.

Public responsibilities:

- Accept responsibility to appropriately manage the obvious risks that exist in their chosen recreational setting.
- Be properly equipped and have levels of knowledge, skill and ability required for their chosen activities.
- Seek information and advice from Hydro Tasmania on local conditions, the hazards

and the level of preparedness necessary to safely pursue the planned activities.

- Observe and comply with warnings, regulations and consider safety information and advice provided.

5.4 Public Safety Management Guidelines

Hydro Tasmania's strategy for the management of public risk is to categorise its land into spatial areas known as 'sites', identify the acceptable risk levels (ARLs) for those sites and to manage the risks at those sites within the context provided by the ARLs. Public Safety Management Guidelines (PSMG), developed as a component of the PSMS (refer to Figure 1) and aligned with Hydro Tasmania's Integrated Business Risk Management Standard, provide the method for implementing that strategy. The Guidelines have four parts that are summarised in the sections below.

5.4.1 Part A - Method to Categorise Public Sites and Determine the Acceptable Risk Levels

Part A of the PSMG outlines the method for categorising public sites/areas. The categorisation of public sites is based on the type of visitors to the site, the Level of Service (LoS)²¹ provided, and level of invitation to visit the site. The categories encompass a range of sites from: day use with high service levels, such as Waddamana Museum; day use get away; easy access camping; and remote bush areas where no services are provided (not managed for visitor service areas). Each LoS has a corresponding acceptable risk level (ARL) and each public site is assigned an ARL. The ARL specified for each LoS identifies the highest level of risk that is consistent with the visitor's skills and abilities, and the primary function of the site.

All land / sites managed by Hydro Tasmania will be assigned a public site category which describes the appropriate level of service. The public site category will also specify the ARL for each site. For sites where public access is not permitted, as there are hazards that present an unacceptable risk to the public or the business (e.g. canals, penstocks, power stations, tailraces and spillways), control measures will be taken to address hazards assessed at a risk level above the ARL, or sites will be managed as Exclusion Zones (see 5.4.3) or Controlled Areas.

Categorisation will also be guided by the ARL of adjoining sites²² managed by third parties, e.g. the PWS, Forestry Tasmania and Municipal Councils. A detailed methodology for site categorisation is provided in the PSMG Part A.

²¹ Level of Service (LOS) incorporates a range of factors including access, amenities, heritage and recreation opportunities, information and signage, and management activity. For each factor there are differing LoS, e.g. roads vary from a basic 4x4 access track through to a Class 1 sealed road.

²² Where Hydro Tasmania sites adjoin sites managed by the Tasmanian Parks and Wildlife Service those sites shall be managed in a manner consistent with the ARL stipulated by the PWS *Reserves Standards Framework*. Existing land use, level of service and implied risk levels will guide the management of public risk on Hydro Tasmania land where third party land managers have not stipulated an ARL.

5.4.2 Part B - Method to Assess Hazards and Treat Risks

Part B of the PSMG outlines how hazards are assessed and the consideration of treatments to mitigate the risks identified. A stepwise procedure for assessing hazards on public sites managed by Hydro Tasmania and determining whether or not treatment or controls are required to reduce or eliminate the associated risks is provided. Where risk treatment is required, the method provides guidance on determining the treatments to be adopted. Importantly, the method also presents core requirements for the documentation of the assessment and treatment of risks at public sites and establishes the foundation for monitoring the implementation and management of risk

5.4.3 Part C – Hydro Tasmania Exclusion Zone Engineering Standard

Hydro Tasmania has a responsibility to ensure that individuals cannot unknowingly access areas of land and water which may be hazardous due to generation operations. Hazardous areas may not always be obvious or predictable from the public's perspective and for that reason a Hydro Tasmania's Exclusion Zone Engineering Standard has been established to address the management of exclusion zones regardless of whether the hazard is permanent or intermittent (i.e. exclusion zones around spillways will remain in force regardless of whether or not the dam is on spill).

Potentially hazardous areas of water covered by this Standard include:

- the body of water immediately upstream of dams, weirs or spillways;
- the body of water immediately below weirs or spillways;
- the body of water immediately surrounding power station intakes;
- the body of water immediately downstream of power station tailraces or outflows (gates/valves etc.); and
- water conveyance assets (canals and flumes).

5.4.4 Part D – Hydro Tasmania Signage Manual

The Signage Manual (2015) sets out the procedures, sign designs, and layout for signs used to manage risk to the public. This document currently addresses hazard signage, however, future versions will be developed to address other signage such as orientation and information.

5.5 Implementation

Implementation of the PSMS will be undertaken through six key elements that are described below.

5.5.1 Hazard Assessment and Treatment Plans

Utilising Parts A and B of the Guidelines Hydro Tasmania will develop Hazard Assessment and Treatment Plans for its public use areas that identify the hazards and management objectives for the treatment of the hazards, and assign responsibility for implementation. Hydro Tasmania will develop and implement procedures to identify, assess and, where appropriate, control risks in the Hazard Assessment and Treatment Plans for public sites.

This involves steps as illustrated in Figure 2.

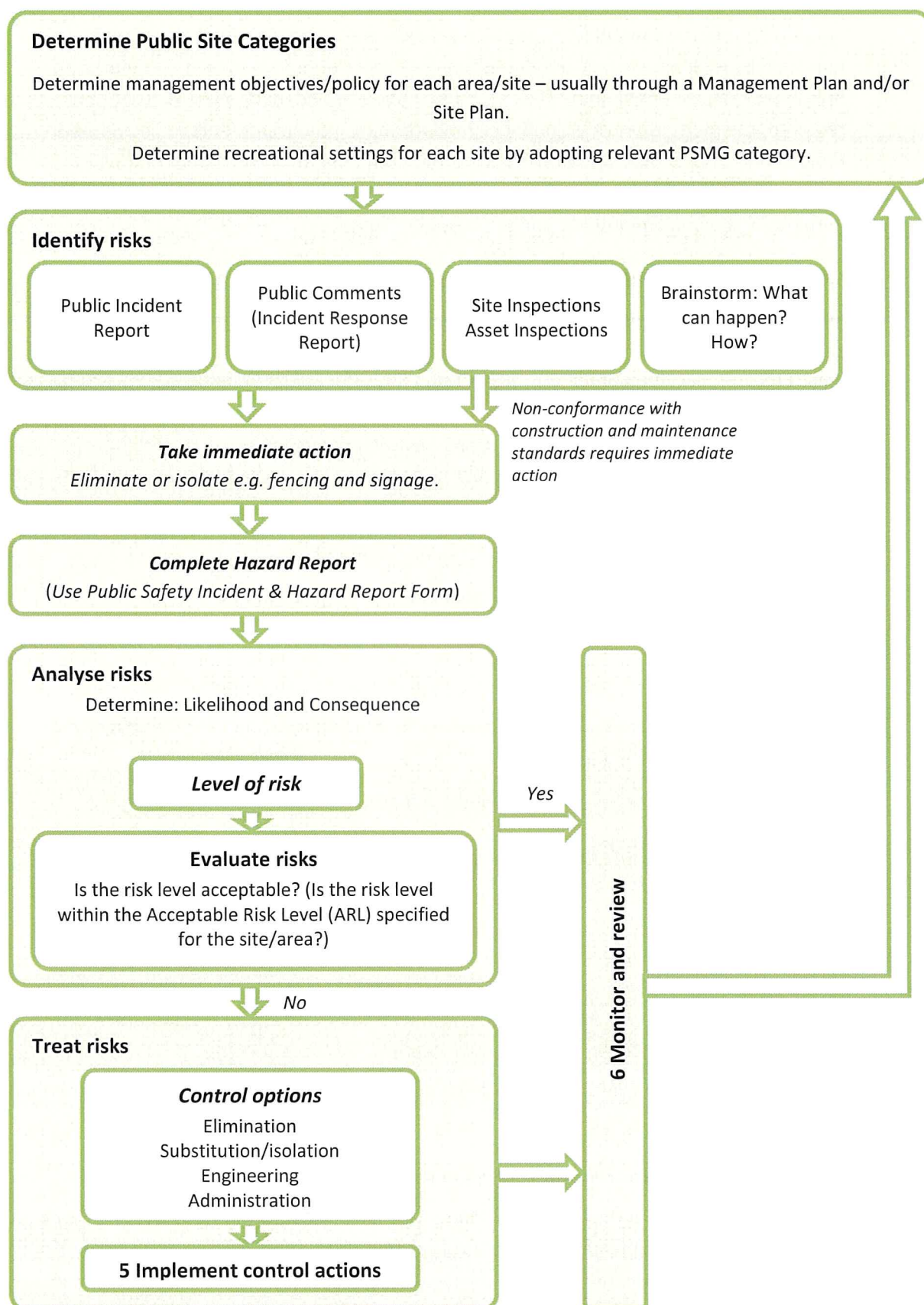


Figure 2: Public Risk Identification, Assessment and Control Process

5.6 Incident Management and Emergency Response

Public Safety incident management will be incorporated into HSE procedures to ensure appropriate management and follow up of incidents.

Management of public safety incidents must be undertaken in consultation with Hydro Tasmania's General Counsel and/or Corporate Solicitor, Brand and Communications Team, Production Managers and WHS and HSE Systems Manager.

All public safety incidents must be reported by staff as soon as practicably possible. Public safety incidents will be managed via Hydro Tasmania's existing HSE incident management process "Mysap Incident Management".

Regional Emergency Response Plans will be developed and maintained as part of the broader Hydro Tasmania Corporate Governance Framework for Emergency Management as set out in the Business Resilience Standard currently under development. The plans will enable a coordinated and timely response to likely foreseeable incidents that may place the public at an unacceptable risk. The Plans will:

- Identify sites and situations where Hydro Tasmania could potentially have to respond to an emergency.
- Assess the risk and prioritise those sites and situations identified.
- Develop Regional Emergency Response Plans for those high priority situations, linking them to Hydro Tasmania's existing emergency response plans and processes.
- Review plans annually.

Hazard Assessment and Treatment Plans will include a list of sites and emergency situations that are to be covered by the Regional Emergency Response Plans and those sites and situations that require inclusion.

The development of Regional Emergency Response Plans should be preceded by risk assessments.

5.7 Public and Stakeholder Information and Communication

Adequate information should be provided to enable the public to make decisions on the recreational experience and risks involved with visiting a particular setting. An overarching communication plan will be developed to guide communications to enable the public to understand the risks involved with Hydro Tasmania's operations so that they can select the recreational experience that best matches their ability.

The communication plan should consider the use of various media, e.g. signs, the internet, phone/tablet apps, brochures, radio, newspaper and magazine articles.

Where necessary, and after a formal risk assessment, key safety messages for specific recreational activities will be developed.

The design and provision of safety signage and other pre-visit information should be preceded and informed by a risk assessment. The use of safety signs will be consistent with the Method to Assess Hazards and Treat Risk (Part C of the PSMG) and comply with Hydro Tasmania's Signage Manual (Part D of the PSMG).

5.8 Training

To implement the PSMS a Public Safety Risk Management Team will be established, with resources from within Assets and Infrastructure Operations and Production and Maintenance Teams, and team members will be trained to undertake site categorisation, conduct public safety risk assessments and implement the controls. See responsibilities and accountabilities (Section 6).

Training will also need to be given to Hydro Tasmania employees as part on their induction to ensure that they are aware of the PSMS and legal requirements, and their roles and responsibilities so that they can effectively manage risks to the public. Training will be undertaken according to the HSE procedure: HSEP0601 - Awareness, Training & Competency.

Production Managers will ensure a sufficient number of employees in their Region are trained to fulfil PSMS ongoing monitoring and review requirements.

5.9 Asset Management

Public facilities will be maintained, designed, located and built so they are safe to use as far as reasonably practicable, and comply with regulatory requirements.

Maintenance schedules will be prepared for all public facilities and sites and documented in the Maintenance Management module of SAP. These schedules will be used to coordinate inspections to ensure compliance with defined standards.

The standard and type of public facilities provided should be consistent with the LoS setting category.

Maintenance of infrastructure elements critical to safety will meet requirements of the *Building Act 2000* (Tas), the *Building Amendment Act 2012* (Tas) and other relevant standards.

5.10 Audit

The implementation of this PSMS will be reviewed and internally audited every two years. The audit includes but is not limited to:

- development and implementation of Hazard Assessment and Treatment Plans;
- risk identification, assessment and control;
- incident management and reporting; and
- training and management competency.

An annual performance report will be prepared by the Operational Compliance and Capability Manager.

The following performance indicators will be used to assess the success of the PSMS implementation/performance:

- Number and % of public sites inspected for hazards;
- Number of uncontrolled hazards identified;
- Number of hazards identified;
- Number of identified hazards risk assessed;
- Number of control actions (hazard treatments) identified; and
- Number of control actions (hazard treatments) implemented.

6. Responsibilities and Accountabilities

Accountability	Position responsible	Standard reference
Provision of adequate resources to ensure PSMS and tools are developed and implemented to enable effective policy implementation. Communication of PSMS performance and issues to CEO and Corporation Board	Chief Operating Officer	
Ensure consistent application of this PSMS and related procedures.	Manager: Environment Health and Safety	
Development and maintenance of processes, procedures and guidelines in consultation with Hydro Tasmania Corporate management and Production Managers to enable the effective and efficient implementation of the Standard.	WHS & HSE Systems Manager	
Development and maintenance of procedures to enable the recording of public incidents, hazards, risk assessments, control actions, resourcing and responsibilities.	WHS & HSE Systems Manager	
Undertaking PSMS public site assessments	Manager Sustainable Resource Management	
Assessing the level of risk that hazards pose. Establishment of a PS Risk Management Team. Hazard assessments should be undertaken by members of the Risk Management Team.	Public Safety Risk Management Team and Production Managers Asset Portfolio Managers	5.4.1 5.8
Identifying public safety hazards.	Public Safety Risk Management Team and Production Managers / Asset Portfolio Managers	5.5
Identifying control actions to address hazards.	Production Managers / Asset Portfolio Managers	5.4.2

Accountability	Position responsible	Standard reference
Documenting and resourcing the implementation of control actions.	Production Managers / Asset Portfolio Managers	5.5
Development and implementation of Hazard Assessment and Treatment Plans. The plans will identify employee roles and responsibilities related to implementation of the Standard covering: <ul style="list-style-type: none"> • processing of Public Incident and Hazard Reports; • areas/situations to be inspected and risk assessed; • training; and • development and maintenance of emergency response procedures. 	Manager Sustainable Resource Management / Production Manager Non Generating Assets	5.5
Implementation of PSMS public site assessment treatment plans	Manager Production and Maintenance	
Training of members of the Public Safety Risk Management Team and applicable employees in the principles of public risk identification, assessment, and control.	WHS & HSE Systems Manager	5.8
Have a sufficient number of trained employees to undertake risk assessments.	Manager HSE and WHS/ Production Managers / Asset Portfolio Managers	5.8
Prepare annual performance report.	Manager Production and Maintenance	5.10
Monitoring and reviewing performance.	Manager Production and Maintenance & Production Managers	5.5
Schedule and conduct standard implementation audits.	Operational Compliance and Capability Manager	5.10
Development of key safety messages for specific recreational activities.	Environment Health and Safety Manager / Manager Brand & Communications	5.7
Development and maintenance of public facilities consistent with legislative and Hydro Tasmania standards.	Manager Production and Maintenance / Production Managers / Asset Portfolio Managers	5.9

Accountability	Position responsible	Standard reference
Regular legal review of legislative change to update requirements in this standard	Manager HSE and WHS / Environmental Policy Advisor	
Provide information and advice on the relevant standards and rules governing the design, building and maintenance of public infrastructure.	Building Services Engineer (Production & Maintenance)	
Maintenance of infrastructure elements critical to safety in accordance with the <i>Building Act 2000</i> .	Building Engineer Production and Maintenance	5.9
Incorporate Public Safety into SAP Incident Management System	Manager HSE and WHS	5.6
Incorporate Public Safety Emergency Response Plans into broader Hydro Tasmania Corporate Governance Framework for Emergency Management as set out in the Business Resilience Standard (currently under development) and undertake ongoing review.	Emergency Management Officer	5.6
Formal documentation providing approval for use of lands managed by Hydro Tasmania contains appropriate indemnity clauses.	General Council / Corporate Solicitor	4.4
Formal documentation providing approval for provision of commercial services on lands managed by Hydro Tasmania contains appropriate indemnity clauses.	General Council / Corporate Solicitor	4.3
Report hazards that pose a potential risk to the public.	Employees	
Report incidents – accidents and near misses.	Employees	
Incident owner and management of logged incidents	Production Managers	
Assist the public who have suffered injury in accordance with the Hydro Tasmania's Public Incident Management Procedure.	Employees	5.6
Ensure that worksites and facilities are not left in a condition that may cause injury unless appropriate warnings and barriers are in place.	Employees	

7. Implementation Strategy

Implementation of the PSMS is currently being trialled to determine the efficacy of the processes that are outlined in the Standard and the PSMG's.

An implementation strategy will be developed following formal approval and adoption of the PSMS.

8. Related Documents

Communications Plan (to be drafted)

Dam Operations and Maintenance Manuals

Hazard Assessment and Treatment Plans (to be drafted)

Incident and Hazard Report Form

Incident Response Form

Public Safety Incident Management Procedure (to be drafted)

Public Safety Management Guidelines

- Part A - Method to Categorise Public Sites and Determine Acceptable Risk Levels (in draft)
- Part B - Method to Assess Hazards and Treat Risk (in draft)
- Part C - Hydro Tasmania Exclusion Zone Standard (in draft)
- Part D - Hydro Tasmania Hazard Signage Manual (in draft)
- Part E - Information and Orientation Signage Manual (to be drafted)

9. Definitions and Abbreviations

Acceptable Risk Level (ARL)	The Acceptable Risk Level refers to a site's risk threshold beyond which risks must be treated. The method of assessment, the threshold levels and the treatment of risks are outlined in <i>Public Safety Management Standard Guidelines Part B: Method to Assess Hazards and Treat Risks</i> .
ALARP	As Low As Reasonably Practicable
Commercial Service providers	A commercial provider of recreational services or facilities on Hydro Tasmania land or waterways usually under a contract arrangement such as a lease or licence.
Consequence	The outcome, impact or severity as a result of an event occurring.
Control Actions	Acts to minimise negative risks or enhance positive opportunities.
Controlled Areas/Sites	Refers to Hydro Tasmania controlled work sites. Risk management in these areas is guided by Hydro Tasmania's HSE Safe Work Practices handbook. 'Access to any Hydro Tasmania controlled site requires pre approval by the asset owner or asset owner's delegate' (HSE Safe Work Practices handbook: 14).
Dangerous Recreational Activity	As defined under the <i>Civil Liabilities Act 2002</i> - a recreational activity that involves a significant degree of risk of physical harm to a person.
DFL	Design Flood Level
Event	Occurrence of a particular set of circumstances. A breakdown event is at a point where there is a loss of control, e.g. someone slipping on a step.
Exclusion Zones	Areas defined in <i>Hydro Tasmania's Exclusion Zone Standard 2015</i> from which the public is excluded for reasons of safety, asset protection or to protect natural or cultural values.
Foreseeable Risk	A risk that is not far-fetched or fanciful. A foreseeable risk of harm is a risk of harm of which the person knew or ought reasonably to have known. Refer to the <i>Civil Liability Act 2002</i> (Tas), Section 11.1.a.
FSL	Full Supply Level

Hazard	A source of potential harm or a situation with a potential to cause loss. A hazard is not a risk until people are exposed and involved and an event occurs.
HSE	Hydro Tasmania's Health, Safety and Environment (HSE) management system The HSE management system is based on international standards for safety and environmental management, OHS AS18001 and ISO14001 respectively.
Hydro Tasmania	Short form abbreviation for Hydro Tasmania
Hydro Tasmania land	The term 'Hydro Tasmania land' will refer to both land and water owned by Hydro Tasmania and third party land where Hydro Tasmania has control over electricity infrastructure.
Incident	An unplanned event which includes an accident, near miss, and injury.
Incident Management Database	The HSE database that records public incidents, hazards, risk assessments and treatment plans.
Level of Service (LoS)	Level of Service refers to what is provided or managed at a site including access, amenities, recreation, information and signage, management activity e.g. ground maintenance. There are four different levels of service: Basic, Mid, Complex and Visitor Centre. The Levels of Service Standards are identified in Public Safety Management Guidelines Part A: Method to Categorise Public Sites and determine Acceptable Risk Levels V1-2016
Obvious Risk	<p>As defined in the <i>Civil Liabilities Act 2002</i> (Tas), Section 15.</p> <ol style="list-style-type: none"> (1) An <i>obvious risk</i> to a person who suffers harm is a risk that, in the circumstances, would have been obvious to a reasonable person in the position of that person. (2) Obvious risks include risks that are patent or a matter of common knowledge. (3) A risk of something occurring can be an obvious risk even though it has a low probability of occurring. (4) A risk can be an obvious risk even if the risk (or a condition or circumstance that gives rise to the risk) is not prominent, conspicuous or physically observable. (5) A risk is not an obvious risk merely because a warning about the risk has been given.
Probability	A measure of the chance of an occurrence/event.

PSMG	Public Safety Management Guidelines
PSMS	Public Safety Management Standard
Public Site	The term 'Public Site' refers to a geographic area whose boundaries are defined by the predominant visitor type, duration of stay, level of visitor experience and risk level, the setting, the typical activities undertaken, services and facilities and the standard of access.
Reserve Activity Assessment (RAA)	The Tasmanian Parks and Wildlife Service's environmental impact assessment documentation.
Risk	The chance of something happening that will have an impact upon objectives.
Reserved Land	Land proclaimed reserved land under the <i>Nature Conservation Act 2002</i> for which Hydro Tasmania is the managing authority.
Recreational activity	Any sport (whether or not the sport is an organised activity); and, any pursuit or activity engaged in for enjoyment, relaxation or leisure. As defined in the <i>Civil Liabilities Act 2002</i> (Tas), Section 19.
Recreational setting	Refers to the environment in which a recreational pursuit occurs.
Risk assessment	The overall process of risk analysis and risk evaluation. The results of which are documented. See Section 6.3.
SAP Plant Maintenance Module	The Works Module within the SAP system that enables the documentation of actions and allocation of resources.
Setting	The term 'setting' describes a site's social context, physical characteristics and the Level of Service provided.
Should	In this policy 'should' is used to state the desirable practice for most situations and is to be interpreted by Hydro Tasmania Managers taking account the context of the situation. 'Should' statements will be applied unless there are good reasons for making exceptions and acceptable outcomes are achieved.
TPWS	Tasmanian Parks and Wildlife Service
TWWHA	Tasmanian Wilderness World Heritage Area

Visitor	A person visiting or using public areas managed by Hydro Tasmania. This does not include Hydro Tasmania employees/volunteers or contractors. Visitors to 'workplaces' as defined under the <i>Work Health and Safety Act 2015</i> (Tas) or non-public sites are not subject to this Standard and are dealt with under the HSE policies and procedures of Hydro Tasmania.
WHS	Workplace Health and Safety
Will	In this policy 'will' is used to state a required practice. 'Will' statements must be complied with.
WMA	<i>Water Management Act 1999</i> (Tas)

APPENDIX A: Known activities undertaken on Hydro Tasmania land

Third party use of Hydro Tasmania land for commercial purposes

- Abseiling from Gordon Dam
- Beekeeping
- Bike riding and mountain biking
- Bushwalking with guides
- Commercial tourism and sightseeing
- Fishing with guides or for commercial purposes
- Grazing
- Helipads
- Hunting for commercial or conservation purposes
- Mining
- Professional photography
- Seaplanes
- Scientific investigations/monitoring
- Telecommunication sites
- Timber harvesting

Public Recreational and Public Use Activities

Land based recreational activity

- Abseiling
- Beekeeping
- Bike riding and mountain biking
- Bushwalking
- Camping
- Fishing
- 4WD and trail bikes
- Hunting
- Picnics and BBQs

On water recreational activities

- Canoeing and kayaking
- Fishing
- Jet skiing
- Power boating
- Rowing
- Water skiing"

Public use of boat ramps, jetties and pontoons

Unauthorised access and use of Hydro Tasmania land, including vandalism and wood hooking

APPENDIX B: Relevant Sections of the Civil Liabilities Act

Section 11 of the Act provides that a person does not breach a duty to take reasonable care unless:

- there was a foreseeable risk of harm (that is, a risk of harm of which the person knew or ought reasonably to have known);
- the risk was not insignificant; and
- in the circumstances, a reasonable person in the position of the person would have taken precautions to avoid the risk. In deciding whether a reasonable person would have taken precautions against a risk of harm, the court will consider the following (among other relevant things):
 1. the probability that the harm would occur if care were not taken;
 2. the likely seriousness of the harm;
 3. the burden of taking precautions to avoid the risk of harm; and
 4. the potential net benefit of the activity that exposes others to the risk of harm.

Part 9 of the Act makes special provision for the liability of 'public and other authorities' (which includes Hydro Tasmania) for claims for damages for personal injury or death or damage to property resulting from breach of duty. Specifically, Section 38 of the Act provides that the following principles apply in determining whether a statutory authority such as Hydro Tasmania, has a duty or has breached a duty:

- (a) the functions required to be exercised by the authority are limited by the financial and other resources that are reasonably available to the authority for the purpose of exercising those functions;
- (b) the reasonableness of the allocation of those resources by the authority is not open to challenge;
- (c) the functions required to be exercised by the authority are to be determined by reference to the broad range of its activities (and not merely by reference to the matter to which the proceedings relate);
- (d) the authority may rely on evidence of its compliance with its general procedures and any relevant standards for the exercise of its functions as evidence of the proper exercise of its functions in the matter to which the proceedings relate.

In practical terms these principles recognise that:

- Hydro Tasmania's management of public risk is limited by the financial and other resources that are reasonably available for that purpose when considered in the broader context of Hydro Tasmania's activities and responsibilities.
- Hydro Tasmania's allocation of financial and other resources cannot be questioned.
- Hydro Tasmania's primary purpose is to generate electricity not to provide for

recreation and the associated risks.

Hydro Tasmania can rely on compliance with processes, procedures and standards established by the PSMS and its implementation as evidence of its appropriate management of public risk and whether or not it has breached a duty of care.

APPENDIX C: Hydro Tasmania's Health Safety and Wellbeing Policy

[http://mycollaboration/sites/sas/HSESystems/Documents/Policies/Hydro Entura Momentum
m%20 %20WHS%20Policy.pdf](http://mycollaboration/sites/sas/HSESystems/Documents/Policies/Hydro%20Entura%20Momentum%20WHS%20Policy.pdf)

APPENDIX D: Hydro Tasmania's Sustainability Code

<http://myhydro/OurBusiness/Sustainability/Pages/default.aspx>

APPENDIX E: Hydro Tasmania's Recreation Principles

Hydro Tasmania group Recreation principles

For nearly 100 years we have been working with nature to generate power. We have pioneered in remote and beautiful parts of Tasmania, and along the way we have helped connect remote communities throughout the state. In 'the construction years' we created spaces for recreation and provided ways for people to get there.

We are the largest water manager in Australia and we know that our hydropower operations impact people beyond power generation.

That's why we have developed our recreation principles – to work with the public, community groups and other recreation providers, so our focus can be on generating renewable energy and yours can be enjoying Tasmania's wide open spaces.

Our recreation vision statement:

Hydro Tasmania will endeavour to effectively manage recreational opportunities on our land and water bodies. We will continue to develop and participate in collaborative management partnerships with stakeholders including government land managers, local councils, recreational clubs, community groups and private businesses. We will work cooperatively with our neighbours to limit impacts on surrounding land uses and activities.

Recreational Management Principles

Hydro Tasmania has adopted the following five recreational management principles to guide the planning, development and management of recreation opportunities on its land and water bodies.

Operational safety and security

Hydro Tasmania aims to manage recreational sites, infrastructure and services in line with asset safety and security protection using contemporary standards and practices for health risk and public safety.

Environmental management

Hydro Tasmania aims to manage recreational use to protect and enhance bio-diversity, water quality and environmental services with consideration to the predicted impacts of climate change. Other considerations will include the protection of our cultural heritage including social, aesthetic landscape and historic values.

Access to multiple-use recreational opportunities

Hydro Tasmania aims to provide access to a diversity of public recreational activities on our land and water bodies that are

compatible with our operations and community needs. Recreational opportunities and facilities will endeavour to cater for a range of user groups and the public benefit in general.

Community engagement and support

Hydro Tasmania will continue to communicate and engage with stakeholders about access, use and management of our recreational assets. We will ensure that there is open communication with user groups.

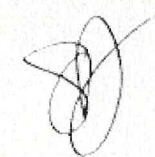
Economic benefits

Hydro Tasmania recognises the connection between access to and use of our recreation assets in the provision of benefits to local and regional economies. Wherever possible we will also promote private investment in appropriate recreation opportunities.

Sustainability at Hydro Tasmania

For Hydro Tasmania, being sustainable involves the application of economic, social and environmental considerations to business decisions and activities. Hydro Tasmania believes that these considerations will help drive long-term business success and allow successive generations to enjoy the benefits of a clean energy future.

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



Signed by Stephen Davy CEO

