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REVISION HISTORY

Rev No.	Issue Date	Brief Description of the Change
01	2017-01-01	New Document
02	2017-07-05	MOC 17-007 Removed Signature Block MOC 17-008 Added Document Classification to footer MOC-17-014 6.3.1 Addition of details around training of Stakeholder Liaison; 6.4.2 Addition of Stakeholder Consultation (last paragraph)
03	2018-12-24	Revisions to address DNV audit findings related to spill response and full-scale exercises for the Emergency Management Program.
04	2019-04-30	Clarified the purpose, scope and the roles and responsibilities. Odourant Spill was added to the list of potential hazards. Reference to the Action Management Process was added to Section 7. Details with respect to the EMP Policy were clarified.

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1 PURPOSE

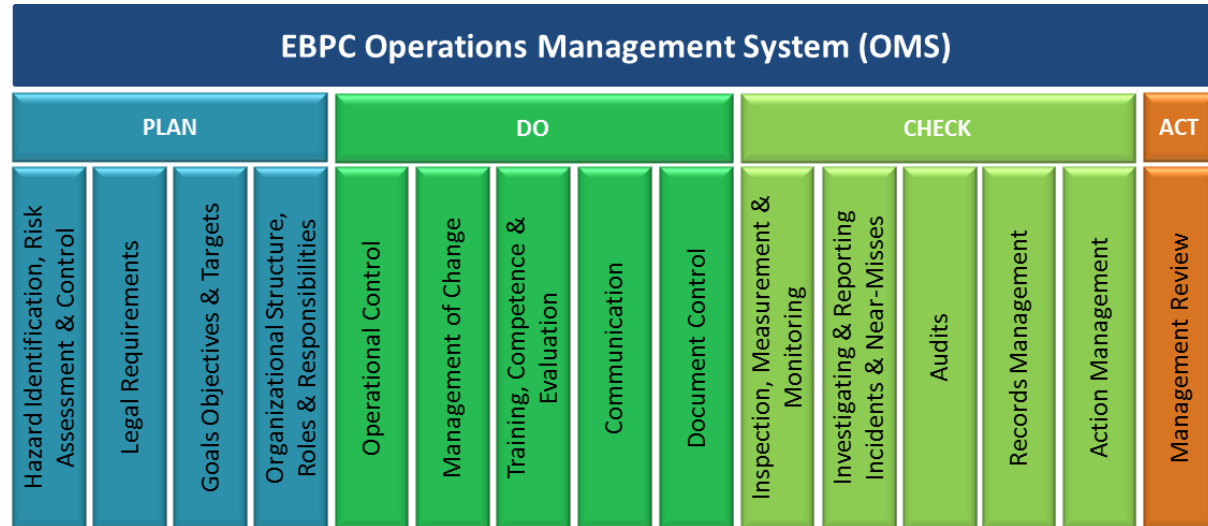
Emera Brunswick Pipeline Company Ltd. (EBPC or the Company) has established the Operations Management System (OMS or Management System) (OMS-SYS-01) and Management Programs in order to anticipate, prevent, manage and mitigate conditions that may adversely affect the safety and security of the public, the Company’s employees, the environment, and the Company’s assets.

The OMS supports, guides and aligns all EBPC Programs, including the Emergency Management Program (EMP), by providing an overarching framework and a single set of building blocks – the overarching processes – that all Programs use to identify hazards, manage risks, train and manage workers, communicate to stakeholders, manage records and documentation, monitor and evaluate progress, and continually improve performance. EBPC’s OMS integrates the Company’s Management Programs, ensuring that emergency management goals, hazards, responses and other emergency management considerations identified in the EMP are considered in the planning for all other Programs.

The purpose of the EMP is to anticipate, prevent, manage and mitigate conditions during an emergency that could adversely affect the public, first responders, the Company’s employees, the environment, and the Company’s assets. The EMP also identifies emergency management hazards and assesses and prioritizes risks using EBPC’s risk assessment process, the Hazard Identification, Risk Assessment and Control Process (OMS-PRO-01). The EMP is designed to apply the selected controls and recovery measures for these risks, including abnormal operating conditions, accidental releases, incidents and emergency situations, to minimize their impacts, and prevent incident escalation and reoccurrence. EBPC has developed a comprehensive Emergency Response Plan (ERP) (EMP-PDR-01) and Crisis Management Plan (CMP) (EMP-PDR-02) that support the achievement of this Program’s purpose.

The EMP leverages the OMS, describing all emergency management tasks required for pipeline operations; it adds emergency management specific procedures, information and references that guide EBPC towards meeting its goals for the Program and the Company. The Program is further linked to the Company’s operations through the Pipeline Operations and Maintenance Manual (POMM-PRG-01).

1.1 Elements of the Emergency Management Program (EMP)



The OMS and the above overarching Processes support, guide and align all EBPC Management Programs

Emergency Management Program

The EMP Leverages the OMS, adding emergency management specific details, information and references that guide EBPC in meeting the goals of the Program and the Company.

The EMP includes relevant procedures and further links to operations through the Pipeline Operations and Maintenance Manual (POMM-PRG-01).

Emergency Management Procedures

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2 SCOPE

The scope of the EMP applies to all NEB-regulated pipelines and an associated pipeline facility owned or operated by EPBC and extends to all EBPC Management Programs. EBPC employees are required to understand and follow the EMP.

EBPC's EMP is further supported and sustained by numerous partners and stakeholders including, but not limited to, mutual aid partners, municipalities, local emergency responders, the public adjacent to the pipeline, and various government agencies.

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3 DEFINITIONS

Term	Definition
Abnormal Operating Conditions (AOC)	<p>A condition that may indicate a malfunction of a component or deviation from normal operations that may:</p> <ol style="list-style-type: none"> 1) indicate a condition exceeding design limits, or 2) result in a hazard(s) to persons, property or the environment.
Accountable Officer (AO)	<p>A person appointed who has authority for the financial and human resources of the Company required to meet its obligations for safety, security and protection of the environment. This person is responsible on the Company's behalf for the Company's Management System and related Programs. The AO provides the focus, direction, influence and leadership, which is required to create a robust safety culture, and implement and continually improve a well-functioning Management System within the organization.</p>
Brunswick Pipeline Technician	<p>EBPC employees with direct knowledge and expertise related to the Brunswick Pipeline right-of-way and operations.</p>
Continuing Education and Liaison Activities	<p>Activities that EBPC has identified in its Communication Requirements Register (OMS-REG-08) and undertakes to:</p> <ul style="list-style-type: none"> • establish and maintain liaison with agencies that may be involved in an emergency response on the pipeline and are consulted when EBPC makes material changes to its Emergency Management Program or related procedures; • inform all persons who may be associated with an emergency response activity on the pipeline of the practices and procedures to be followed and make available to them the relevant information that is consistent with this Emergency Management Program and related procedures; • inform the police, fire departments, medical facilities, other appropriate organizations and agencies and the public residing adjacent to the pipeline of the location of the pipeline, potential emergency situations involving the pipeline and the safety procedures to be followed in the case of an emergency.
Crisis Management Team (CMT)	<p>This team is responsible for legal and regulatory notifications, and administrative duties in support of the Incident Commander. The CMT may be activated at all levels of emergency.</p> <p>The Accountable Officer or Director of Legal and Regulatory Affairs may serve as leader of the CMT.</p>

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Term	Definition
Duty Manager	<p>Person responsible to be on call in case of emergency and could activate the Emergency Response Plan (EMP-PDR-01). The following positions may fill the Duty Manager role:</p> <ul style="list-style-type: none"> • Accountable Officer; • Director, Legal and Regulatory Affairs; • Manager, Operations and Engineering; • Sr. Manager, Health, Safety, Security and Environment; • Regulatory Compliance Manager; and • Lead Maintenance Technician.
Emergency Planning Zone (EPZ)	<p>The zone 800 meters from center of pipeline in which significant adverse health effects could occur in the instance of a pipeline emergency if appropriate emergency response is not taken. EBPC's Continuing Education and Liaison Activities focus on stakeholders who reside or work in the Emergency Planning Zone.</p>
Incident Command System (ICS)	<p>EBPC utilizes the ICS structure in responding to and managing emergencies. This structure is supported by two teams or groups:</p> <ul style="list-style-type: none"> • Emergency Response Team (ERT) • Crisis Management Team (CMT) <p>The ERT consists of all relevant personnel who will respond to an emergency when an emergency situation is declared by the Incident Commander. Depending on the scale of the emergency, the ERT may include the following response roles:</p> <ul style="list-style-type: none"> • Incident Commander • Operations Section Chief • Liaison Officer • Safety/Environmental Officer • Logistics Section Chief • Planning Section Chief • Information Officer or Communications Lead
Incident Commander (IC)	<p>The Incident Commander is responsible for all emergency activities, including the development of strategies and tactics and the ordering and the release of resources during an emergency. The IC has overall authority and responsibility for conducting emergency operations and is responsible for the management of all operations at the emergency site.</p>
Management System Governance Committee	<p>A Committee made up of Senior Leadership, Process and Program Owners. The Committee may be supported by subject matter experts, as required. This cross-functional Committee reviews Process and Program-level information to ensure that the Company meets the requirements of its Management System. In utilizing this</p>

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Term	Definition
	information, the committee will provide direction, recommendations and prioritization for recommended improvements to Processes, Programs, and the Management System.
Operations Management System (OMS or Management System)	It is a systematic approach designed to effectively manage and reduce risk, and promote continual improvement. The OMS includes the organizational structures, resources, accountabilities, policies, processes and procedures required for the organization to meet its obligations related to safety, security and environmental protection. Management Systems are organized around a Plan, Do, Check, Act Cycle for continual improvement.
Policy	A directive by the organization of its intentions, principles, and expectations, which guides its business and employees' actions in the conduct of business.
Procedure	A documented series of steps followed in a regular and defined order thereby allowing individual activities to be completed in an effective and safe manner. A procedure also outlines the roles, responsibilities and authorities involved in the actions. Describes how to carry out the activity or a procedure.
Process	A documented series of actions that take place in an established order and are directed toward a specific result. A process also outlines the roles, responsibilities and authorities for completing each process step.
Process Manager	Person who is designated by the Process Owner to implement a Process so that it realizes its objectives as measured by key Process indicators.
Process Owner	Person accountable for a Process and its implementation. The Process Owner has the authority to make necessary Process changes so that the Process realizes its objectives as measured by the key Process indicators and continues to meet Company needs.
Program	A documented set of procedures designed to regularly accomplish a result. A program outlines how plans, process outcomes and procedures are linked, and how each one contributes to the result. A company regularly plans and evaluates its program to check that the program is achieving the intended results.
Program Manager	Person who is designated by the Program Owner to implement a Program so that it realizes its purpose as measured by key Program indicators.

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Term	Definition
Program Owner	Person accountable for a Program and its implementation. The Program Owner has the authority to make necessary Program changes so that the Program purpose is realized as measured by key Program indicators and the Program continues to meet Company needs.
Senior Leadership	Senior organizational leaders made up of the Accountable Officer and his/her direct reports. Senior Leadership provides oversight of the Management System, its Processes, the Management Programs, and related work, and participates in the Management System Governance Committee.

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4 POLICY AND COMMITMENT

4.1 Leadership Accountability

The Accountable Officer, EBPC’s Senior Leadership, and the OMS Process and Program Owners have established the OMS to ensure a shared corporate understanding of EBPC’s commitment to continual improvement in the areas of safety, security, and environmental protection. These senior managers are responsible for implementation and continual improvement of the OMS and Programs, including providing feedback, as necessary.

The Accountable Officer has designated the responsibility for the EMP to the Manager, Operations and Engineering (Program Owner). The Program Owner is responsible for implementation and continual improvement of the EMP, including providing feedback as necessary to the Accountable Officer. Any issue or concern with respect to the EMP which cannot be addressed or resolved by the Program Owner will be brought to the Accountable Officer’s attention for final resolution without compromising the requirements of the applicable codes, standards, current related Acts and Regulations, good engineering practices and the requirements of this Program.

EBPC’s Senior Leadership acknowledges the importance of the EMP in achieving the goals of EBPC’s objective of ‘zero incidents’, and as such, they are dedicated to providing the leadership and resources necessary to foster a successful Program.

4.2 Policy and Commitment Statements

EBPC’s Senior Leadership has established a number of corporate- and Program-level policies (see OMS-SYS-01) that are intended to outline organizational expectations and guide all Company activities. Corporate-level policies apply to all EBPC employees and govern all Management Programs.

The Emergency Management Policy (EBPC-POL-06) establishes EBPC’s objectives and commitment with respect to emergency management.

Emera Brunswick Pipeline Company Ltd. is committed to emergency prevention and preparedness. As such, the Company has implemented a comprehensive Emergency Response Program and Plan that includes the following elements:

- Management’s commitment to safeguard the health and safety of employees and the public and to protect the environment;
- Strategic alliances to be able to respond to potential pipeline-related incidents;
- A proven, industry-recognized emergency response management system (Incident Command System (ICS) - Canada) with clear authorities for emergency response activities;
- Scheduled exercises and Program/Plan reviews designed to promote employee awareness and continuous improvement.

For complete details, please refer to EBPC’s Emergency Management Policy.

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As part of EBPC’s commitment to sound emergency management, EBPC management, employees and contractors are encouraged to bring forward emergency management issues and concerns associated with the operation and maintenance of EBPC’s assets. EBPC’s Whistleblower Policy (EBPC-POL-07) outlines the protections in place for persons who report emergency management issues and misconduct associated with the Company’s pipeline operations.

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5 PLANNING

The OMS Processes outlined below guide the identification of key inputs and considerations for planning individual programs.

5.1 Hazard Identification, Risk Assessment and Control

EBPC has established and implemented a Hazard Identification, Risk Assessment and Control Process (OMS-PRO-01) to guide the identification of hazards and potential hazards, the degree of risk associated with the hazards and the implementation of control measures based on probability and consequence to prevent and/or mitigate such risks.

Based on an assessment using its Hazard Identification, Risk Assessment and Control Process and its Hazard and Risk Register (OMS-REG-01), EBPC has identified the following potential hazards that can disrupt or impact the normal operations that could lead to a possible emergency for EBPC's Brunswick Pipeline System.

- Facility/Pipeline Fire
- Facility/Pipeline Explosion
- Person Down, Rescue and Medical Situation
- Natural Disasters
- Threat of Aggressive Action/Bomb Threat
- Odourant Spill (Mercaptan Odour Control and Spill Response Procedure (EPP-PDR-09))

As part of its Emergency Response Plan (EMP-PDR-01), EBPC has developed procedures to control and mitigate these specific potential hazards.

In addition, the Hazard and Risk Register (OMS-REG-01) lists all the hazards, potential hazards, risks, and control measures addressed by the Programs within the OMS.

5.2 Legal Requirements

EBPC has established and implemented a Legal Requirements Process (OMS-PRO-02) for identifying and monitoring legal and regulatory compliance. In addition, EBPC has established and maintains a Legal Register (OMS-REG-02), which lists the acts and regulations, certificate conditions, orders, and permits addressed within the OMS and Management Programs.

5.3 Goals, Objectives and Targets

EBPC has set goals for the prevention of ruptures, liquid and gas releases, fatalities and injuries and for the response to incidents and emergency situations. These goals are developed by EBPC Senior Leadership in accordance with EBPC's Goals, Objectives and Targets (GOTs) Process (OMS-PRO-03). The GOTs reflect the direction and desired outcomes of EBPC's policies, and provide the basis for EBPC's commitment to continual improvement in safety, security, and environmental protection. EBPC GOTs, including those set for the EMP, are documented in its Goals, Objectives and Targets Setting Template (OMS-FRM-03) and are reviewed on a quarterly basis as outlined in OMS-PRO-03.

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5.4 Organizational Structure, Roles and Responsibilities

EBPC has established and implemented an Organizational Structure, Roles and Responsibilities Process (OMS-PRO-04) to ensure the provision of resources to successfully meet the requirements of its OMS, Management Programs and its obligations to carry out activities in a manner that ensures the safety and security of the public, employees, the EPBC System, and protection of property and the environment.

EBPC completes an annual documented evaluation in order to demonstrate continued adequate human resourcing to meet these obligations.

5.4.1 Emergency Response Structure

EBPC has adopted the Incident Command System (ICS) for its emergency response structure under the Emergency Response Plan (EMP-PDR-01). As such, the organizational structure can be scaled and tailored to the emergency.

For detailed roles and responsibilities, please see the Emergency Response Plan (EMP-PDR-01, Duties and Responsibilities Section). EBPC emergency structure may also take advantage of mutual aid (Section 5.4.1.1) and other emergency resources (Section 5.4.1.2).

5.4.1.1 Mutual Aid Agreements

In many operational areas of the Brunswick Pipeline System, formal and informal mutual aid agreements may be arranged with other operators, third party companies, and municipal and government agencies. As mutual aid partnerships are developed, partners will be made aware of the hazards, their potential role, and Company expectations during an emergency response.

5.4.1.2 Emergency Resources

All responders identified in the ERP shall be advised that they are on the emergency contact list (Emergency Contacts, ERP Annex D) and know what is expected of them in case of an incident or emergency. The list shall be reviewed at least once a year and updated, if warranted, whenever resources, organizational structures, procedures, regulations or EBPC's Hazard and Risk Registry changes.

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5.4.2 Emergency Management Program Roles and Responsibilities

5.4.2.1 Accountable Officer

The Accountable Officer’s responsibilities include:

- Annually reviewing and approving the Emergency Management Policy statement
- Endorsing and supporting the EMP and the ERP
- Ensuring EBPC is adequately resourced to respond to emergencies
- Implementing the Crisis Management Plan (EMP-PDR-02)
- Being on a rotational call as Duty Manager

5.4.2.2 Manager, Operations & Engineering (EMP Program Owner)

The responsibilities of the Manager, Operations & Engineering include:

- Developing, implementing, monitoring and continuously improving the EMP and related procedures (ERP, CMP)
- Annually updating EBPC’S Emergency Management Policy (EBPC-POL-06) and updating the EMP, ERP, and CMP
- Ensuring the EPZ Stakeholder List is updated annually
- Being on a rotational call as Duty Manager
- Quarterly reporting on the GOTs and incidents
- Employing or contracting the appropriate people and resources to support the EMP
- Managing Mutual Aid Agreements with respect to emergency response
- Assuming a role in the ICS structure depending on the incident
- Ensuring EBPC has the resources required to respond to all emergencies
- Identifying and providing employees with the support and training necessary to conduct their responsibilities under the EMP
- Maintaining documents and records related to the implementation of the EMP
- Encouraging employees to report emergency management concerns and suggest improvements related to the EMP
- Ensuring emergency management related legal requirements are identified, monitored and met
- Ensuring emergency management related hazards and risks are identified, monitored, mitigated and controlled
- Completing other OMS requirements related to the EMP, including ensuring emergency management-related corrective actions are tracked and closed
- Reporting on the EMP during the Management Review meetings
- Ensuring all EMP communication requirements are implemented

5.4.2.3 Director of Legal and Regulatory Affairs

The responsibilities of the Director, Legal and Regulatory Affairs

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- Being on rotational call as Duty Manager
- Potential assignment to a role within the ICS structure once EBPC's ERP has been initiated
- Implementing the Crisis Management Plan (EMP-PDR-02)

5.4.2.4 Sr. Manager, Health, Safety, Security and Environment (HSSE)

The responsibilities of the Sr. Manager, HSSE include:

- Being on rotational call as Duty Manager
- Potential assignment to a role within the ICS structure once EBPC's ERP has been initiated
- Providing, as required, subject-matter expertise in the event of an environmental emergency

5.4.2.5 EBPC Technicians

The responsibilities of EBPC Technicians include:

- Being on rotational call as Brunswick Pipeline Technician
- Assignment to a role within the ICS structure once EBPC's ERP has been initiated
- Monitoring for and responding to potential abnormal operating conditions
- Will reside within two hours or less of the rural and urban EBPC facilities.
- Some of these personnel will reside within a half hour or less of the urban based proposed facilities.

5.4.2.6 Duty Manager

The responsibilities of a Duty Manager include:

- Being on rotation call as the person with authority to initiate the ERP (EMP-PDR-01) after regular business hours.
- Point of contact for EBPC technician call outs and alarms after regular business hours
- Will reside within two hours or less of the rural and urban EBPC facilities.
- Assignment to a role within the ICS structure once EBPC's ERP has been initiated
- Monitoring for and responding to potential abnormal operating conditions

5.4.2.7 EBPC Employees

The responsibilities of all EBPC employees include:

- Implementing the EMP and its associated procedures as they apply to the employee's duties, and reviewing and following the EMP Policy
- Actively participating in the ongoing evaluation and operation of the EMP
- Ensuring readily available access to the Company's ERP

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Four additional personnel must be available to respond to an incident, depending on its severity, at all times. These personnel will also reside within two hours or less of the rural and urban facilities.

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6 IMPLEMENTATION

The implementation phase outlines the approach for executing EBPC programs, including the EMP. This phase includes the following processes: Operational Control; Management of Change; Training, Competence & Evaluation; Communication; and Document Control. These Processes, as they relate to the EMP, are described below.

6.1 Operational Control

6.1.1 Normal Operations

EBPC has established and implemented an Operational Control Process (OMS-PRO-05) for developing and implementing corrective, mitigating, preventive and protective controls associated with the hazards and risks of operating the Brunswick Pipeline System. Further, EBPC has procedures for coordinating, controlling and managing the operational activities of its employees and other people working with or on its behalf.

6.1.2 Abnormal Operations

All Abnormal Operating Conditions (AOC) are managed through the EMP Program.

The EMP controls and recovery measures include the following EMP Procedures outlined in Table 4.

Table 1: EMP Procedures

Procedure Number	Title	Purpose
EMP-PDR-01	Emergency Response Plan (ERP)	To provide effective emergency response to any incident/emergency involving the Brunswick Pipeline System. The ERP addresses Assets, Hazards and Level of Emergencies, Emergency Response Structure, Duties and Responsibilities, Actions and Notifications, Post Incident.
EMP-PDR-02	Crisis Management Plan (CMP)	To assist employees to effectively manage communications (internal and external) during a crisis.

For the purposes of implementing the EMP, the management team has incorporated the following controls:

- Continuing education through SPA-PRG-01, liaison and outreach activities with response agencies, landowners and the public;
- Arrangements with third party emergency response providers;

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- Emergency management training programs. This includes ICS-100 training for all employees and ICS-200 Training for employees who will be assuming Duty Manager roles;
- Inspections and maintenance of emergency management equipment/spare parts.

6.1.3 Operational Control – Contractor Management

EBPC has developed an Operational Control Process (OMS-PRO-05) for managing contractors and ensuring they adhere to the EMP.

6.2 Management of Change

EBPC has established and implemented a Management of Change Process (OMS-PRO-06) which identifies and manages any change that could affect safety, security or protection of the environment, including any new hazard or risk, any change in a design, specification, standard or procedure, and any change in the EBPC organizational structure or legal requirements applicable to the Brunswick Pipeline System. Management of Change is critical to ensuring that changes are identified and implemented efficiently, effectively and in a timely manner.

6.3 Training, Competence and Evaluation

EBPC has established and implemented a Training, Competence and Evaluation Process (OMS-PRO-07) for establishing and conducting training for employees related to its OMS and Management Programs. Specific training requirements have been established for each role and are outlined in the Training Register (OMS-FRM-23). A process for developing competency requirements, including the identification and confirmation of applicable licenses and certifications has also been developed to support OMS-PRO-07.

Training requirements specific to the EMP are outlined as follows.

6.3.1 Employee Training Requirements

EBPC will provide Incident Command Training (ICS-100) for all its employees and (ICS-200) for Duty Managers.

The EMP training will include:

- Training on the emergency procedures set out in the EMP;
- Training on procedures for the operation of emergency equipment that EBPC employees and contractors might use;
- Training on ICS;
- Liaison with applicable agencies and interaction with first response agencies and EPZ residents.

In addition, the EMP has established training exercises for emergency response throughout the lifecycle of the pipeline.

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6.3.2 Continuing Education and Liaison Activities

EBPC implements its continuing education and liaison obligations with respect to Onshore Pipeline Regulations (OPR) Sections 33, 34, and 35 through its Operations Management System, utilizing both its Stakeholder & Public Awareness Program (SPA) and its Communications Requirements Register (OMS-REG-08). The SPA supports the EMP by guiding the implementation of these continuing education and liaison activities in an effort to ensure a coordinated approach for all EBPC external communication.

EBPC develops a continuing education program for the police, fire departments, medical facilities, other appropriate organizations and agencies and the public residing adjacent to the pipeline to inform them of the location of the pipeline, potential emergency situations involving the pipeline and the safety procedures to be followed in the case of an emergency.

EBPC has grouped emergency response stakeholders into stakeholder groups based on the roles and responsibilities they would have in responding to a potential emergency on the Brunswick Pipeline, their level of interest and influence with respect to the ERP, and the information these stakeholders require (as outlined in the Communications Requirements Register, OMS-REG-08). This stakeholder analysis determines the continuing education and liaison activities the emergency response stakeholder groups receive.

These stakeholder groups are listed in EBPC’s Communications Requirements Register, and include:

- **Primary Emergency Response Stakeholders:**

In the event of an emergency, these stakeholders would be first responders and as such they have a high level of interest and a high level of influence over EBPC’s ERP. Consequently, EBPC needs to manage this group of emergency response stakeholders closely and provide information that ensures these stakeholders are aware of the potential emergency situations on the Brunswick Pipeline and their specific roles and responsibilities.

- **Secondary Emergency Response Stakeholders:**

In the event of an emergency, these stakeholders would serve as supporting agencies. EBPC has determined that this group of stakeholders has a low level of interest, but a high level of influence over EBPC’s ERP. As such, these stakeholders require information that will keep them apprised of updates to EBPC’s ERP. As warranted and based on the scenario, some of these stakeholders may be invited to participate in an EBPC emergency response exercise.

- **Tertiary Emergency Response Stakeholders:**

In the event of an emergency, these stakeholders would serve as supporting communication agencies. EBPC has determined that these stakeholders have a low level of interest, but a high level of influence over EBPC’s ERP. As such, EBPC needs to coordinate any

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communication to the public with these stakeholders in regards to EBPC’s emergency response exercises.

The frequencies of communications deliverables are laid out in EBPC’s Communications Requirements Register and vary according to stakeholder. For instance, Primary Emergency Response Stakeholders receive an ERP Continuing Education Session every three years, beginning in 2017.

6.3.3 Exercises

Emergency response exercises are designed to simulate the response to a wide range of potential emergency scenarios associated with the pipeline. An exercise enables internal and external responders to be trained for various roles in responding to an emergency. Annual exercises serve as verification of response preparedness and validation of EBPC’s EMP procedures and their effectiveness. The Company considers exercises as key aspects of emergency preparedness training and requires all employees at all levels of the Company to participate in emergency response exercises. This training may include any of the following types of exercises and will be tracked in the Training Register (OMS-REG-07):

6.3.3.1 Drill

A drill is a supervised activity that tests a single or specific operation or function. Drills are commonly used to provide training on new equipment, or test new procedures; to practice and maintain skills; or to prepare for more complex exercises. For the purposes of this measure, “man down” and fire drills are excluded and should not be reported.

Examples of drills may include:

- Testing the Emergency Call Out Process (On-call technician, Duty Manager and Gas Control)
- Testing the Crisis Management Team functions and responsibilities
- Testing the Logistics Section

6.3.3.2 Tabletop Exercise

A tabletop exercise is a facilitated analysis of an emergency in an informal, stress-free environment. It is designed to elicit constructive discussion as participants examine and resolve problems based on existing operational plans and identify if those plans need to be changed. A tabletop exercise will be conducted annually and can also be used when new personnel are introduced to the EMP.

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6.3.3.3 Functional Exercise

This can be a single or multi-agency activity designed to evaluate capabilities and multiple functions using simulated response, without moving people or equipment to a real site. A functional exercise is designed to evaluate management of emergency operations centers, command post and headquarters.

A functional exercise may include:

- An Emergency Operations Centre (EOC) Exercise – to test and develop communication between different EBPC departments who will be part of an emergency response. Communications include telephone lines, runners, radio phones, fax machines, computers, etc.
- Inter-organizational communication exercises – to accommodate external responding agencies (e.g., local authority, health authority, non-government organizations, etc.).
- Public Information Exercise – to coordinate with the media to disseminate factual and timely information to social and traditional media
- Security or threat exercise

6.3.3.4 Full-Scale Exercise

This is an exercise in which multi-agency, multi-jurisdictional activities take place involving the mobilization and actual movement of emergency personnel, equipment, and resources, as if a real incident had occurred. Full-scale exercises are intended to provide a realistic simulation of an emergency and its response. As an NEB Certificate condition, Full-scale exercises are to be performed annually and will alternate between the urban and rural section of the pipeline right-of-way. The design of a full-scale exercise must consider:

- Resources required internally and externally
- Safety of all personnel and any public members involved
- Exercise objectives (strategic and tactical)
- Notification of the exercise to everyone involved (e.g., public, media, response agencies, regulatory authorities, etc.)

A post exercise debrief shall take place and the outcomes and lessons learned from the exercise will be completed and acted upon, including incorporating any risks identified into EBPC's risk analysis process.

6.3.4 Post Exercise Debrief

A post exercise debrief must be completed after an exercise. Discussion and review by all personnel involved in the exercise shall assist in assessing outcomes of the exercise objectives.

Lessons learned from exercises are a valuable source of evaluated information and reference data for emergency planning. When exercise outcomes necessitate changes to the EMP and/or related procedures, the Program Owner is responsible for initiating the MOC Process to initiate the implementation of those changes.

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6.4 Communication

Stakeholder engagement and communication are an important element of the OMS as it demonstrates EBPC’s proactive commitment to continual improvement in safety, security, and environmental protection. EBPC will engage internal and external stakeholders whose work is related to the OMS, who live and work around the Brunswick Pipeline System, or who have an interest in them as identified in the Communications Requirements Register (OMS-REG-08). To support external communications and engagement, EBPC has established a Stakeholder and Public Awareness Program (SPA-PRG-01).

EBPC’s emergency response stakeholders are also consulted any time EBPC makes material updates to its ERP.

EBPC’s Emergency Response Plan identifies when and how Emergency Response Stakeholders are notified in the event of an emergency.

6.5 Document Control

EBPC has established and implemented a Document Control Process (OMS-PRO-09) for identifying, preparing, reviewing and controlling documents required for the Company to meet its obligations to conduct activities in a manner that ensures the safety, security of the public, employees and the pipeline.

To ensure accurate and effective response capabilities are maintained, EBPC will conduct a review of its EMP documentation on an annual basis at a minimum.

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7 CHECKING AND CORRECTIVE ACTION

The processes outlined in the checking and corrective action phase are designed to provide quality assurance for the EBPC processes and programs. Within this phase, EBPC has established and implemented the following quality assurance processes:

- A process for inspecting and monitoring the company’s activities and facilities to evaluate the adequacy and effectiveness of EBPC’s Management Programs;
- A process for the internal reporting of hazards, potential hazards, incidents and near-misses;
- A process for conducting audits of EBPC’s Management Programs and Management System and implementing corrective action plans to address any audit non-compliances;
- A process for generating, retaining and maintaining records that document the implementation of EBPC’s Management System and Management Programs; and
- A process for taking corrective and preventive actions if deficiencies are identified within EBPC’s Management Programs and Management System.

7.1 Inspection, Measurement and Monitoring

EBPC has established and implemented an Inspection, Measurement and Monitoring Process (OMS-PRO-10) for evaluating the adequacy and effectiveness of the Programs and for taking corrective and preventive actions if deficiencies are identified.

EMP specific inspection, measurement and monitoring activities include the following:

- Emergency exercises
- Aerial patrols
- Weekly patrols
- Inspection and maintenance of emergency management equipment/spare parts
- Gas control monitoring (SCADA)

7.2 Investigation and Reporting Incidents

EBPC has established and implemented a process for the internal reporting of hazards, potential hazards, incidents and near-misses (Investigating & Reporting Incidents and Near-Misses Process (OMS-PRO-11)). The Process also includes conducting investigations where required or where hazards, potential hazards, incidents and near-misses have or could have resulted in significantly compromising safety or security of the public, company employees and the pipeline, and protection of property and the environment.

EBPC’s incident reporting database is a reporting tool, accessible to all employees, for reporting and tracking incidents or near-misses. The tool generates notifications to managers and leaders whenever an incident is reported, and records immediate and root causes as well as corrective actions to be applied. The Hazard Reporting Form (OMS-FRM-01) can be used by any employee for reporting hazards, potential hazards, incidents and near-misses to their supervisor so that

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corrective and preventive actions can be implemented in the unlikely case that the database becomes unavailable the database is not available. An Incident Report Form (OMS-FRM-18) is also available to report information required for reportable incidents.

7.3 Internal Audits

EBPC has established and implemented a process for conducting audits and for taking corrective actions if non-compliances are identified. The Audit Process (OMS-PRO-12) describes, in part, steps for identifying required audits, conducting audits, and the development and implementation of Corrective Action Plans. Audits of this Emergency Management Program must be completed at a minimum every three (3) years.

7.4 Records Management

EBPC has established and implemented a Records Management Process (OMS-PRO-13) for generating, retaining and maintaining records that document the implementation of the Management System and its Management Programs, and for providing access to employees who require records in carrying out their responsibilities.

7.5 Action Management

EBPC has established and implemented an Action Management Process (OMS-PRO-15) for managing and ensuring the effective implementation of preventive and corrective actions resulting from the implementation of the OMS Processes, Programs and Procedures.

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8 ACT

8.1 Management Review

EBPC has established and implemented a Management Review Process (OMS-PRO-14) for conducting quarterly and annual reviews of the Management System and its Programs, including the EMP. This Process provides structured and systematic information to the Management System Governance Committee to enable organizational decision-making and to drive continual improvement.

EBPC senior management will review and ensure the suitability, adequacy, and effectiveness of the EMP and its associated procedures (EMP-PDR-01 and EMP-PDR-02) annually or after a real emergency has happened (whichever comes earlier).

The review should confirm:

- a) That the EMP is fully implemented
- b) That the EMP meets the operator's policy and objectives
- c) That the EMP is adequate for its intended purpose
- d) Where improvements are required in the EMP

The review will address the following subjects:

- a) The state of preparedness for emergency response (e.g., emergency response plan, training, and exercise reports)
- b) Emergency response arrangements and information sharing with municipal emergency service providers
- c) Emergency communication plans (internal and external for surrounding communities)

Additional data sources available to assist the EMP review may include:

- a) Security Risk Assessments
- b) Security Incident Management

(Refer to the Security Program (SMP-PRG-01) for details.)