VERSION HISTORY

Version #	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	MOC 18-035 Revisions to address DNV audit findings related to spill response and full-scale exercises for the Emergency Management Program.
04	2019-04-30	MOC 19-006 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.
05	2020-04-30	MOC 20-020 Changed NEB to CER.
06	2021-04-20	MOC 21-008 Revisions to address DNV audit findings related to Document references and required formatting as set out in EBPC's Document Identification Process (OMS-PRO-09A) and Document Management Process (OMS-PRO-09B).

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1 PURPOSE

Emera Brunswick Pipeline Company Ltd. (EBPC or the Company) is the owner and operator of the Brunswick Pipeline. The Brunswick Pipeline System is a natural gas transmission pipeline that extends from Saint John to St. Stephen, New Brunswick. The pipeline has a maximum allowable operating pressure of 9930 kPag (1440 psig), is 145km long, and 762mm (30-inch) in diameter.

EBPC has developed, implemented and maintains this Emergency Management Program (EMP) to anticipate, prevent, manage and mitigate conditions during an emergency that may adversely affect the safety and security of the public, first responders, the Company's employees, the environment, and the Company's assets, and to meet the requirements set out in the *Canadian Energy Regulator (CER) Onshore Pipeline Regulations*. The EMP has also been established to adhere to and in support of EBPC's overarching policies and goals.

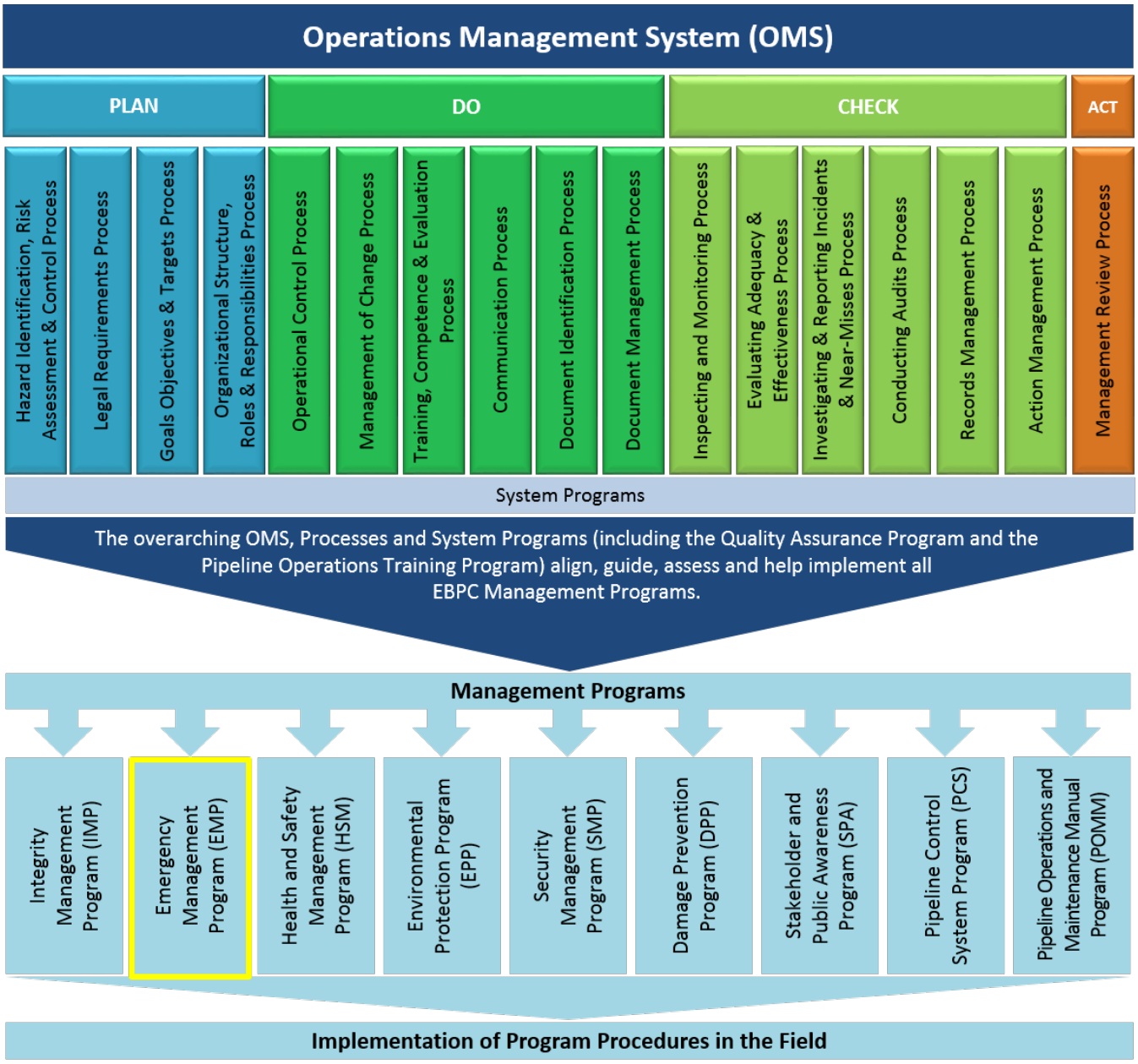
The EMP helps EBPC proactively identify emergency management hazards and manage the related risks that may be introduced by Abnormal Operating Conditions, accidental releases, incidents and emergency situations.

To help control these identified risks, the EMP includes a comprehensive Emergency Response Plan (ERP) (EMP-PRG-01-PDR-01) and Crisis Management Plan (CMP)(EMP-PRG-01-PDR-02). These procedures help minimize the identified risks' impacts, prevent incident escalation and reoccurrence.

In addition, EBPC has established a Stakeholder and Public Awareness Program (SPA-PRG-01) to ensure coordinated communication and liaison activities with external stakeholders, including pipeline safety and emergency preparedness messaging and continued education for emergency response stakeholders.

EBPC's Operations Management System (OMS) (OMS-SYS-01) applies to the EMP. The OMS supports, guides and aligns all EBPC Programs, including the EMP, by providing an overarching framework and a single set of building blocks–the overarching processes–that all Programs use to identify and analyze hazards, evaluate and manage risks, train and manage workers, communicate with those who live and work around the Brunswick Pipeline, manage records and documentation, monitor and evaluate progress and continually improve performance. As such, the OMS provides coordination between the EMP and the Company's other Management Programs, and ensures the EMP is systematic, comprehensive, explicit and proactive. See Figure 1 below for how the EMP is integrated into EBPC's OMS.

Figure 1: Emergency Management Program and the OMS



2 SCOPE

The scope of the EMP applies to all CER-regulated pipelines and associated pipeline facilities owned or operated by EBPC and extends to all EBPC Management Programs, as each program is interrelated. All 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.

3 DEFINITIONS

Table 1: Definitions

Term	Definition
Abnormal Operating Conditions (AOC)	A condition that may indicate a malfunction of a component or deviation from normal operations that may: 1) indicate a condition exceeding design limits; or 2) result in a hazard(s) to persons, property or the environment.
Accountable Officer (AO)	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.
Continuing Education and Liaison Program	Activities that EBPC has identified in its Communication Register (OMS-PRO-08-REG-01) and undertakes to: • 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)	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. The Accountable Officer or Director of Legal and Regulatory Affairs may serve as leader of the CMT.
Duty Manager	Person responsible to be on call in case of emergency and could activate the Emergency Response Plan (EMP-PRG-01-PDR-01). The following positions may fill the Duty Manager role: • Accountable Officer;

Term	Definition
	• Director, Legal and Regulatory Affairs; • Manager, Operations & Engineering; • Sr. Manager, Health, Safety, Security and Environment; • Regulatory Compliance Manager; • Quality Assurance Specialist; and • Lead Maintenance Technician.
Emergency Planning Zone (EPZ)	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 Program focuses on stakeholders who reside or work in the Emergency Planning Zone.
Incident Command System (ICS)	EBPC utilizes the ICS structure in responding to and managing emergencies. This structure is supported by two teams or groups: • Emergency Response Team (ERT) • Crisis Management Team (CMT) 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: • Incident Commander • Safety/Environmental Officer • Information Officer or Communications Lead • Liaison Officer • Operations Section Chief • Logistics Section Chief • Planning Section Chief
Incident Commander (IC)	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.
Maintenance Technicians	EBPC employees with direct knowledge and expertise related to the Brunswick Pipeline right-of-way and operations.
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 purpose is realized as measured by key Process indicators and the Process continues to meet Company needs.

Term	Definition
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.
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 Team	Senior organizational leaders made up of the Accountable Officer, Process and Program Owners. The Senior Leadership Team provides oversight of the Management System, its Processes, and the Management Programs.

4 POLICY AND COMMITMENT

4.1 Leadership Accountability

EBPC's Senior Leadership Team, comprised of the Accountable Officer, Process and Program Owners, has established the OMS (OMS-SYS-01) 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, OMS Process Owners and Program Owners, are responsible for implementation and continual improvement of the OMS and Programs, including providing feedback, as necessary, to the Accountable Officer.

The Accountable Officer has designated the responsibility for the EMP to the Manager, Operations & 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 Team acknowledges the importance of the EMP in achieving EBPC's goals of zero fatalities, zero injuries, zero ruptures, zero leaks, and zero spills for the prevention of ruptures, gas releases, fatalities and injuries and for the response to incidents and emergency situations, 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 Team has established 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. The Policy ensures emergency response activities are conducted in a manner that ensures the safety and security of the public, employees, the pipeline, and the protection of property.

EBPC is committed to emergency prevention and preparedness. As such, the Company has implemented a comprehensive EMP that includes the following elements:

- Management's commitment to safeguard the health, safety and security of employees and the public, to protect the environment, and to ensure the protection of property and the safety and security of the pipeline;
- 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, refer to EBPC's Emergency Management Policy.

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.

5 PROGRAM PLANNING

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

EMP Program inputs, as they relate to these Processes, are described below.

5.1 Hazard Identification, Risk Assessment and Control

The Brunswick Pipeline is a transmission pipeline transporting natural gas.

EBPC has established and implemented a Hazard Identification, Risk Assessment and Control Process (OMS-PRO-01) to describe the Company's approach for identifying and analyzing hazards and potential hazards, and the use of EBPC's Hazard & Risk Register (OMS-PRO-01-REG-01) in establishing and maintaining an inventory of the identified hazards and potential hazards.

As part of its hazard assessment for the EMP, EBPC considers the following:

- Plume dispersion or similar dispersion modeling;
- Identification and documentation of worst-probable emergencies involving the specific products being used or transported;
- A determination of what can go wrong, its effects, its likelihood of occurrence, how often it could occur and the location of occurrence;
- Consideration of the dangers arising from human activity, such as fire, explosion, environmental contamination, hazardous substance release or pipeline ruptures, in addition to natural perils;
- An evaluation of the potential for multi-hazard emergencies; and
- Measures that could reduce or eliminate the hazard.

This Process also describes EBPC's approach for evaluating and managing the risks associated with the identified hazards, and for developing and implementing controls to prevent, manage and mitigate the identified hazards and the risks, and for communicating those controls to anyone who is exposed to the risks. In addition, EBPC maintains a list of emergency response equipment in the ERP (Annex F), and inspects this equipment as set out in Section 7.1.1 below.

As part of implementing the requirements of OMS-PRO-01, EBPC also annually holds a Brainstorming Workshop to identify a broad range of potential hazards that may impact its assets and operations and which may not have been considered using the systematic methods outlined in the Hazard Identification, Risk Assessment and Control Process. To ensure a broad range of emergency management hazards and potential hazards are discussed during the Brainstorming Workshop, at a minimum, the following sources of information must be reviewed, any notable findings and trends summarized and presented to the Senior Leadership Team at the Brainstorming Workshop:

- Loss control bulletins;
- Information and Safety Advisories published by the Canada Energy Regulator; and
- other information sources referenced in OMS-PRO-01.

Using its risk assessment procedure in OMS-PRO-01, EBPC has identified the following hazards that can disrupt or impact normal operations that could lead to a possible emergency on EBPC's Brunswick Pipeline System:

- **Fire and/or Explosion -** Working with or around explosive/flammable materials (e.g. natural gas, odourant). Fire can occur when flammable material, oxygen and sufficient ignition energy are available. Explosion depends on an atmosphere of a mixture of flammable material with oxygen. This is possible within areas where valves have the risk of release and personnel have non-intrinsically safe equipment.
- **Responding to Rescue and/or Medical Situation** - Responding to a medical situation and/or rescue situation or providing first aid. Slow response possible due to the remoteness of EBPC assets. Risk of not receiving proper treatment/delayed treatment.
- **Natural Disasters** (Weather-related and outside force) - Lightning, floods/heavy rain, hurricanes, tornados, temperature extremes (high or low) resulting in a pipeline integrity impact.
- **Threat of Aggressive Action/Security Threat -** Someone calling EBPC and informing the Company of a potential security threat. The following security threats may escalate to become emergency events:
    - Sabotage/vandalism
    - Domestic activism (terrorism, civil disturbances, military action)
    - Suspicious packages
    - Unauthorized entry
    - Protests
    - Bomb threat
    - Cyberattack (SCADA)
    - Cyberattack (IT)
    - Hostage situation
    - Harassment, assault, disagreements, nuisances, violence, bullying, threats (from parties external to EBPC)
    - Harassment, assault, disagreements, nuisances, violence, bullying, threats (from parties internal to EBPC)
- **Odourant Spill** – Mercaptan spillage caused by natural disasters, odourization system failure or human error that results in exceeding on-site containment (greater than 20 litres).
- **Wildland Fires** - Grass fires, forest fires, shrub fires that approach or are present on the EBPC ROW may be caused by employees conducting scheduled inspections associated with patrols and surveys or may be encountered by EBPC employees.
- **Uncontrolled Gas Release -** Natural gas leak from operating equipment (pipeline, valve site etc.) including fugitive emissions.

Note: The above risks are subject to amendment or replacement. For a detailed and current list of the emergency management related hazards and risks, employees can filter for the Emergency Management Program in the Hazard & Risk Register (OMS-PRO-01-REG-01).

The Procedures developed as part of this Emergency Management Program help control and mitigate these specific emergency management hazards and risks.

The above hazards are also listed in EBPC's Hazard and Risk Register (OMS-PRO-01-REG-01), which lists all the hazards, potential hazards, risks, and control measures addressed by the Company's Programs and the OMS.

5.2 Legal Requirements

EBPC has established and implemented a Legal Requirements Process (OMS-PRO-02) for identifying, and monitoring compliance to, legal requirements.

The Company also maintains a Legal Requirements Register (OMS-PRO-02-REG-01) which lists the legal requirements (Acts, Regulations, certificate conditions, orders, permits, industry standards, industry best practice references, etc.) addressed within the OMS and Management Programs. To monitor compliance with these legal requirements, EBPC's Legal Requirements Register also lists the quality assurance activities (inspections, monitoring activities, audits, etc.) associated with each regulatory condition.

Specifically, the EMP and related procedures have been established and implemented to meet the emergency management related regulatory conditions set out in Table 2 – EMP Legal Requirements below.

Table 2: EMP Legal Requirements

EMP Legal Requirements
Canadian Energy Regulator (CER) Act
Canadian Energy Regulator Onshore Pipeline Regulations
CER Order related to Emergency Procedures Manuals - File OF-Surv-CompMan 01
CER Order AO-001-MO-006-2016 which Varies Order MO-006-2016 Compelling Publication of Emergency Procedures Manuals
CER Amended Order AO-001-MO-002-2017 Compelling Publication of Emergency Management Program Information on Company Websites
CER Order related to Exercise Plans - File OF-Surv-EmerMan-ERE0101
CER Pipeline Performance Measures Reporting
CER - Brunswick Pipeline Certificate of Public Convenience and Necessity, Condition 3 – Commitments (A0Z5S3)
CSA Z246.2-18 Emergency Preparedness and Response for Petroleum and Natural Gas Industry Systems
CSA Z662:19 Oil & Gas Pipeline Systems

Note: The above legal requirements are subject to amendment or replacement. For a detailed and current list of the emergency management related regulatory conditions that form part of the above legal requirements, employees can filter for the EMP or EMP procedure Document ID (i.e. EMP-PRG-01; EMP-PRG-01-PDR-01, etc.) under "EBPC Document" in the Legal Requirements Register.

Noncompliance with the above emergency management laws or regulations and orders may expose EBPC to administrative monetary penalties, fines, and other CER enforcement actions. Employees

are encouraged to raise any questions they may have in relation to this EMP, EMP procedures, or emergency management laws, regulations or orders with their supervisor or the Director, Legal and Regulatory Affairs to help ensure EBPC's compliance with emergency management legal and regulatory requirements.

5.3 Goals, Objectives and Targets

EBPC has established and implemented a Goals, Objectives and Targets (GOT) Process (OMS-PRO-03) for developing, approving, implementing and reviewing OMS and Management Program GOTs, including performance measures for assessing EBPC's success in achieving its GOTs.

Per this Process, EBPC has set the Overarching OMS Goals of zero fatalities, zero injuries, zero ruptures, zero leaks, and zero spills for the prevention of ruptures, gas releases, fatalities and injuries and for the response to incidents and emergency situations.

To support its Overarching OMS Goals, EBPC develops annual Program GOTs, set by EBPC's Accountable Officer with support from the Senior Leadership Team, to address deficiencies identified in the previous year Management System performance results and to continually improve its Management Programs.

EBPC goals for the EMP may include goals related to:

- Engagement on planning;
- Training of first responders;
- Exercises;
- Availability of equipment;
- Response times;
- Incident management;
- Liaison and continuous education; and
- Site-specific (urban or rural) considerations.

EBPC GOTs, including those set for the EMP, are documented in the GOT Form (OMS-PRO-03-FRM-01) and are reviewed on a quarterly basis using EBPC's Management Review Process (OMS-PRO-15).

Program Goals set for the EMP must be aligned with the Program's purpose as set out in Section 1 and in support of EBPC's Emergency Management Policy (EBPC-POL-06).

5.4 Organizational Structure, Roles and Responsibilities

EBPC has established and implemented an Organizational Structure, Roles and Responsibilities Process (OMS-PRO-04) to describe the Company's organizational structure that enables it to meet the requirements of its OMS and its obligations under the Management System.

This Process also describes the Company's use of its Task Allocation Register (OMS-PRO-04-REG-01), established to help EBPC assess its resource adequacy and demonstrate that the human resources allocated to the Management System are sufficient to meet the requirements of the OMS and the Management System.

Roles and Responsibilities specific to the EMP are described below. Additionally, each EMP Procedure must include a list of procedure-specific roles and responsibilities.

5.4.1 General Manager (Accountable Officer)

The Accountable Officer's responsibilities include:

- Annually reviewing and approving the Emergency Management Policy
- Endorsing and supporting the EMP and related procedures
- Providing Program oversight by participating in Management Review Meetings where EMP goals, objectives and targets are reported and reviewed
- Ensuring EBPC is adequately resourced to respond to emergencies
- Resolves any issue or concern with respect to the EMP which cannot be addressed or resolved by the Program Owner without compromising the requirements of the applicable codes, standards, current related Acts and Regulations, good engineering practices and the requirements of this Program
- Being on a rotational call as Duty Manager

5.4.2 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, and providing feedback to the Accountable Officer as necessary
- Carrying out the roles and responsibilities as assigned in the procedures associated with this Program
- Implementing all responsibilities and requirements assigned to the EMP Program Owner in EBPC's Management System Processes
- Ensuring the EMP and SPA Programs are aligned and integrated, and the required emergency management/preparedness public awareness messages and notifications are delivered to EMP external stakeholders
- Initiating the MOC Process to implement lessons learned or continuous improvement opportunities identified as a result of EBPC emergency response exercises
- Managing any contractors engaged to assist with the maintenance of EPZ contact lists
- Organizes emergency response exercises in accordance with the requirements set out in the EMP
- Annually updating EBPC'S Emergency Management Policy (EBPC-POL-06), and updating the EMP and related procedures per the Document Review Schedule set out in the Document Management Process
- Ensuring budgetary and management support is provided for the execution of the EMP
- Employing or contracting the appropriate people and resources to support the EMP and respond to all emergencies
- Managing Mutual Aid Agreements with respect to emergency response
- Ensuring that in addition to one Duty Manager and one on-call Maintenance Technician, four additional field technicians are available to respond to an incident depending on its severity

- Identifying and providing employees with the support and training necessary to conduct their responsibilities under the EMP
- Reporting on pipeline performance measures for the CER
- Managing the Duty Manager Role
- Being on rotational call as Duty Manager

5.4.3 Director, Legal & Regulatory Affairs

The responsibilities of the Director, Legal & Regulatory Affairs include:

- Assisting the Manger, Operations & Engineering in completing any required regulatory notifications
- Reviewing drafts of external communication deliverables set out in the SPA and EBPC's Communication Register (i.e., regulatory, landowner, Third Party notifications; brochures; letters, etc.)
- Being on rotational call as Duty Manager

5.4.4 Senior Manager, Health, Safety, Security and Environment (HSSE)

The responsibilities of the Senior Manager, HSSE include:

- Providing, as required, subject-matter expertise in the event of an environmental emergency
- As warranted, assisting with incident and near-miss reporting and investigation requirements
- Being a resource for employees, supervisors and management related to hazards in the workplace
- Being on rotational call as Duty Manager

5.4.5 Regulatory Compliance Manager

The responsibilities of the Regulatory Compliance Manager include:

- Supporting the Director, Legal & Regulatory Affairs in carrying out their roles and responsibilities under the EMP
- Supporting the Manager, Operations & Engineering in organizing emergency response exercises
- Being on rotational call as Duty Manager

5.4.6 Stakeholder Relations Manager

The responsibilities of the Stakeholder Relations Manager include:

- Supporting the Manager, Operations & Engineering in organizing emergency response exercises
- Supporting the Manager, Operations & Engineering in implementing the Continuing Education and Liaison Program

5.4.7 Quality Assurance Specialist

The responsibilities of the Quality Assurance Specialist include:

- Being on rotational call as Duty Manager

5.4.8 Lead Technician

The responsibilities of the Lead Technician include:

- Being on rotational call as Duty Manager, as warranted

5.4.9 Maintenance Technicians

The responsibilities of EBPC Maintenance Technicians include:

- Following and implementing this EMP and EMP Procedures as set out in the Program and applicable Procedures
- Monitoring for and responding to potential Abnormal Operating Conditions
- Residing 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 facilities
- Being on rotational call as on-call Maintenance Technician

5.4.10 Pipeline Coordinator

The responsibilities of the Pipeline Coordinator include:

- Assisting the Manager, Operations & Engineering with the management of all record requirements set out in the Program, including reviewing records for completeness, uploading records to SharePoint, and communicating any deficiencies to the Program Owner
- Supporting the Manager, Operations & Engineering in organizing emergency response exercises

5.4.11 Duty Manager

The responsibilities of a Duty Manager include:

- Being on rotation call as the person with authority to initiate the ERP outside of regular business hours
- Serving as point of contact for EBPC Maintenance Technician call-outs and alarms after regular business hours
- Residing within two hours or less of the rural and urban EBPC facilities
- Monitoring for and responding to potential Abnormal Operating Conditions

5.4.12 EBPC Employees

The responsibilities of 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 they have readily available access to their copy of the Company's ERP
- Potential assignment to a role within the ICS or CMT structure once EBPC's ERP has been initiated

6 PROGRAM 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; Document Identification & Document Management.

EMP Program implementation, as it relates to these Processes, is described below.

6.1 Operational Control

EBPC has established and implemented an Operational Control Process (OMS-PRO-05) for developing and implementing operational controls for normal and Abnormal Operating Conditions.

For normal operating conditions, EBPC's OMS-PRO-05 describes the planning of work activities and using established programs and procedures to ensure operational control. For normal operating conditions that include work for which EBPC has engaged contractors to work on its behalf, OMS-PRO-05 describes EBPC's contractor management approach. For Abnormal Operating Conditions, OMS-PRO-05 describes the Company's approach to contingency planning for its programs and use of its Emergency Response Plan.

EBPC has also established the Pipeline Operations and Maintenance Manual (POMM-PRG-01) to manage the operational activities of its employees in normal and Abnormal Operating Conditions that do not give rise to an emergency.

The sections below describe the operational controls for normal operating conditions (Section 6.1.1); Abnormal Operating Conditions (Section 6.1.2); and operational controls for contractor management (Section 6.1.3).

6.1.1 Operational Control – Procedures / Normal Operations

Unlike other EBPC Management Programs, the EMP does not include procedures for normal operating conditions as it has been specifically established to anticipate, prevent, manage and mitigate conditions during an emergency. However, the EMP is supported by the operational controls established in other OMS documents, as shown below, which help ensure emergency preparedness and emergency prevention practices are implemented:

- Stakeholder and Public Awareness Program (SPA-PRG-01) and Communication Process (OMS-PRO-08) – The SPA and the Communication Process support the EMP by ensuring a coordinated approach to communicating emergency preparedness and continuing education information to external stakeholders.
- Pipeline Inspection Manager (PIM) Procedure (POMM-PRG-01-PDR-32) – This POMM procedure sets out the inspection and preventative maintenance of emergency equipment at valve stations, including fire extinguishers, as per manufacturer's specifications.
- Office Safety Procedure (HSM-PRG-01-PDR-17) – This HSM procedure sets out EBPC's inspection and maintenance of fire equipment and extinguishers at the EBPC head office.

- Vehicle Operation Procedure (HSM-PRG-01-PDR-15) – This HSM procedure sets out EBPC's inspection and maintenance of fire extinguishers housed in EBPC vehicles.
- Gas Pipeline Shutdown Procedure (POMM-PRG-01-PDR-23) – This POMM procedure sets out EBPC's safe control or shutdown of the Brunswick Pipeline, or parts thereof, in the event of an emergency.
- Imperfection and Defect Inspection Assessment and Repair Procedure (POMM-PRG-01-PDR-06) and Field Repairs and Inspection of Girth Welds, Mill Seam Welds and In-Service Welds Procedure (POMM-PRG-01-PDR-16) – These POMM procedure set out EBPC's repair procedures related to emergency equipment.
- Mercaptan Odour Control and Spill Response Procedure (EPP-PRG-01-PDR-09) – Used in conjunction with the ERP (when the Odourant Spill Response Flowchart is being used), this EPP procedure describes how to control odours in the event of a mercaptan spill and to reduce the potential for adverse environmental, health and safety effects in the event of a spill.

6.1.1.1 Emergency Planning Zone (EPZ)

As an additional operation control, EBPC has established an Emergency Planning Zone, an area in the vicinity of the pipeline in which significant adverse health effects (serious injury or fatality to people) could occur in the instance of a pipeline incident if appropriate emergency response is not taken. EBPC has set the EPZ at 800 meters from center of pipeline. The EPZ is used by EBPC to identify the lateral extent of upset or Abnormal Operating Conditions. EBPC's Continuing Education and Liaison Program as described in Section 6.4.2 below focus on stakeholders who reside or work in the Emergency Planning Zone.

6.1.2 Operational Control – Contractor Management

As part of it's Operational Control Process (OMS-PRO-05), EBPC has established the Operational Control – Contractor Management Procedure for managing contractors and ensuring they adhere to all applicable EBPC Management System and Program requirements, including any relevant sections of the EMP.

For any EMP-related specialized activities or when EBPC does not have the required internal resources to complete a required EMP-related task, the EMP Program Owner may engage contractors per OMS-PRO-05. This includes:

- Identifying the contractor's scope of work;
- Establishing contractor expectations;
- Conducting the contractor prequalification;
- Securing the required Senior Leadership Team approvals;
- Developing appropriate agreements;
- Providing contractor onboarding;
- Managing the contractor;
- Exercising due diligence;
- Performing contractor performance reviews; and
- Assessing the contractor for future use.

EMP content for Contractor Safety Orientation (HSM-PRG-01-PPT-01)

Any contractors engaged for work on the Brunswick Pipeline must successfully complete the Contractor Safety Orientation, per the Health and Safety Management Program, which will incorporate the following content on emergency management:

- Signs of a natural gas pipeline leak – Content must include a description of what a person is likely to see, hear and smell in the event of a natural gas pipeline leak.
- What to do in the event of a suspected natural gas pipeline leak – Content must include a description of activities to do in response to a suspected natural gas pipeline leak, including leaving the area immediately and calling 911 and Brunswick Pipeline's emergency number. The description must also include a list of activities that a person must not do in response to a suspected natural gas pipeline leak, including attempting to operate pipeline valves or to extinguish a natural gas fire.

6.1.3 Operational Control – Upset or Abnormal Operations

All upset or Abnormal Operating Conditions (AOC) are managed through this EMP Program.

The EMP controls and recovery measures include the following EMP Procedures, listed in Table 3 and explained in further detail below. These procedures are used to respond to upset or Abnormal Operating Conditions.

Table 3: EMP Procedures

Document ID	Title	Purpose
EMP-PRG-01-PDR-01	Emergency Response Plan (ERP)	This Procedure describes EBPC's approach to providing effective emergency response to any incident/emergency involving the Brunswick Pipeline System.
EMP-PRG-01-PDR-02	Crisis Management Plan (CMP)	This Procedure describes EBPC's approach to managing communications (internal and external) during a crisis.
EMP-PRG-01-PDR-03	On-Call Procedure	This Procedure describes EBPC's management of the on-call schedule which ensures there is always one Duty Manager and one Technician on call.
EMP-PRG-01-PDR-04	Exercise Debrief Procedure	This Procedure describes EBPC's approach to capturing exercise participants' feedback after emergency response exercises and drafting exercise debrief reports.

6.1.3.1 Emergency Response Plan (ERP)(EMP-PRG-01-PDR-01)

ERP Overview

The ERP provides the emergency response procedures that must be followed by EBPC Personnel to effectively respond to an emergency that may affect operations involving the Brunswick Pipeline System.

EBPC uses the internationally recognized Incident Command System (ICS) for emergency planning and response.

The ERP establishes roles and responsibilities, and provides guidance to safely, efficiently and effectively respond to an emergency by setting and managing the following objectives:

- Ensuring life safety of responders and the public;
- Stabilizing the incident by establishing command, setting objectives, strategies and tactics;
- Minimizing impact to the environment and property;
- Preserving records and evidence for post-emergency investigations and incident recovery; and
- Resuming normal operations as quickly as possible in a safe and efficient manner.

EBPC's ERP is available for public viewing on EBPC's website. Some content may be redacted from public viewing per the information set out in Section 6.4.2 below.

Emergency Phone Number

EBPC has established and maintains an emergency phone number, 1-888-410-2220, the public can use to notify EBPC of a potential emergency. Depending on the nature of the notification, EBPC may initiate its ERP to respond to the potential emergency.

EBPC's emergency phone number is published on EBPC's website, its safety brochures, and all other emergency preparedness materials EBPC distributes to the public and its emergency response stakeholders.

The public may also call 911 in the event of a pipeline emergency.

ERP Emergency Response Structure - the Incident Command System

EBPC has adopted the Incident Command System (ICS) for its emergency response structure under its ERP. As such, the organizational structure can be scaled and tailored to the emergency and takes into account the functions of the federal and provincial governments, local authorities and governments to achieve an effective and efficient response. The ICS is a standardized approached to emergency management that includes personnel, facilities, equipment, procedures, and communications operating within a common organizational structure.

Notifications to Responding and Regulatory Agencies, and the Public

Annex A (Emergency Levels and Response Table) in EBPC's ERP sets out emergency levels and the corresponding required notifications to external responding agencies (i.e. 911; local authorities) and regulatory agencies (i.e. Transportation Safety Board; Canada Energy Regulator). EBPC's Incident Commander is responsible for completing these notifications as required.

Depending on the emergency level, the Incident Commander may engage the Crisis Management Team to complete additional required notifications. In consultation with the Incident Commander, the Crisis Management Team reviews Annex K (Incident Reporting and Notification Requirements) in determining which notifications to response and regulatory agencies apply. EBPC's Crisis Management Plan provides additional guidance related to the role of responding and regulatory agencies in the event of a pipeline emergency.

During emergency incidents, notifications to any affected public are performed by responding agencies. EBPC may assist with these notifications if requested by responding agencies. Using the ICS structure, EBPC and responding agencies will work together to provide updated and current information to the public throughout the emergency incident.

ERP Safety Procedure for Personnel at Emergency Sites

To ensure responder safety during an emergency incident, the ICS structure set out in the ERP includes a Safety Officer who is responsible for monitoring emergency operations and advising on all matters related to operational safety, including the health and safety of emergency responders. During an emergency, the Safety Officer creates a safety plan using the Safety Message/Plan Form (EMP-PRG-01-PDR-01-FRM-06) and ensures continuous monitoring, assessment and mitigation of safety hazards using the Incident Action Plan Safety Analysis Form (EMP-PRG-01-PDR-01-FRM-07). In addition, the Safety Officer has the authority to monitor and suspend any operation which threatens the health and safety of responders.

In addition, the ICS structure provides for scene arrival protocols for both emergency responders and EBPC employees.

ERP 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.

EBPC has established a mutual aid agreement with NB Power's Bayside facility.

ERP Emergency Resources

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

ERP Emergency Response Equipment

EBPC's ERP contains Annex F (Emergency Equipment List) that includes a list of emergency response equipment maintained by EBPC. The storage of EBPC's emergency response equipment takes into account people, property and environmental considerations to minimize response times and reduce potential impacts of incidents.

6.1.3.2 Crisis Management Plan (CMP) (EMP-PRG-01-PDR-02)

The CMP outlines the administrative activities required during and immediately after an emergency, including:

- Ensuring effective and accurate internal and external communications during and immediately following an emergency;

- Ensuring all required legal and regulatory notifications are conducted accurately and in a timely manner; and
- Conducting administrative tasks in support of the Incident Commander as requested.

6.1.3.3 On-Call Procedure (EMP-PRG-01-PDR-03)

The On-Call Procedure sets out EBPC's management of the on-call schedule which ensures there is always one Duty Manager and one Maintenance Technician on call. The Procedure also describes communication and response practices that must be followed when an employee is on call (emergency call-out practices).

Training requirements for Duty Managers and on-call Technicians are set out in Section 6.3.1 below.

6.1.3.4 Emergency Exercise Debrief Procedure (EMP-PRG-01-PDR-04)

The Emergency Exercise Debrief Procedure sets out EBPC's approach to using the Emergency Exercise Debrief Form (EMP-PRG-01-PDR-04-FRM-01) to document completed emergency response exercises and any lessons learned that were identified during emergency response exercises or the post-exercise debrief discussion.

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 people, safety, security, protection of the environment, or property, 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.

The Management of Change Process ensures that any proposed change to the Management System is assessed for adverse impact to all Management Programs, including the EMP.

Any changes or amendments to the EMP Program or EMP Procedures must be implemented through the Management of Change Process which sets out process roles and responsibilities, and how changes are documented, approved, implemented, communicated and reviewed for effectiveness.

6.3 Training, Competence and Evaluation

EBPC has established and implemented a Training, Competence and Evaluation Process (OMS-PRO-07) that sets out the Company's approach to developing competency and training requirements which provide employees and other persons working with or on behalf of the Company with the training that will enable them to perform their duties in a manner that is safe, ensures the security of the pipeline and protects the environment. This Process also describes the Company's approach to verifying that employees and other persons working with or on behalf of the Company are trained and competent and for supervising them to ensure that they perform their duties in a manner that is safe, ensures the security of the pipeline and protects the environment.

This Process also describes EBPC's use of its Competency Register (OMS-PRO-07-REG-01), Training Register (OMS-PRO-07-REG-02) and Training Software to record, track and manage its competency and training requirements,

In addition, EBPC has established and implemented a Pipeline Operations Training Program (OMS-PRG-02) which ensures EBPC Employees are trained in the applicable safety and operating procedures required to conduct their duties in a manner that is safe, ensures the security of the pipeline and protects the environment.

Training requirements specific to the EMP are outlined as follows.

6.3.1 Employee Training Requirements

The EMP training will include:

- EMP Program Awareness training, including 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;
- ICS-100 (Introduction to the Incident Command System) training for all EBPC employees;
- ICS-200 (Basic ICS for Single Resources and Initial Action Incidents) training for Maintenance Technicians and Duty Managers;
- Awareness training for Duty Managers;
- Liaison with applicable agencies and interaction with first response agencies and EPZ residents; and
- Exercises as set out in Section 6.3.2 below.

The above training requirements help ensure EBPC personnel are capable to respond to an emergency in accordance with this EMP and its procedures. This capability is demonstrated through personnel's required participation in the emergency response exercises set out in the following section.

6.3.2 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 capabilities, 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.

In organizing EBPC's exercises, the Manager, Operations & Engineering must ensure exercises:

- Include employees at all levels of EBPC, including the Senior Leadership Team;
- Are held with sufficient frequency to evaluate emergency response capabilities;
- Are varied to test potential emergencies identified in EBPC's Hazard & Risk Register;

- Simulate a wide range of potential geographic and weather conditions as well as worst-case spill or gas release scenarios;
- Include any individuals who may have a role in emergency response as identified in EBPC's ERP;
- Include applicable Emergency Response Stakeholders who may be involved in an emergency response as set out in EBPC's ERP and Communication Register;
- Test mutual aid agreements as required; and
- Include debrief discussions and are documented in the Exercise Debrief Form (EMP-PRG-01-PDR-04-FRM-01) as described in Section 6.1.3.4 above.

This training may include any of the following types of exercises and will be tracked in EBPC's Training Register (OMS-PRO-07-REG-02):

6.3.2.1 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, test new procedures, to practice and maintain skills, or to prepare for more complex exercises.

Examples of drills may include:

- Testing emergency call-out practices (On-call Maintenance Technician, Duty Manager and Gas Control)
- Testing the Crisis Management Team functions and responsibilities
- Testing the Logistics Section

(Fire drills and "person down" exercises are not considered drills for the purposes of meeting EBPC's regulatory obligations related to emergency response exercises.)

6.3.2.2 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.

6.3.2.3 Functional Exercise

A Functional Exercise is 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 posts 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, computers).
- Inter-organizational communication exercises – to accommodate external responding agencies (e.g. local authority, health authority, non-government organizations).
- Public Information Exercise – to coordinate with the media to disseminate factual and timely information to social and traditional media.
- Security or threat exercise.

6.3.2.4 Full-Scale Exercise

A Full-Scale Exercise is a multi-agency, multi-jurisdictional activity 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. Full-scale exercises must be performed annually and 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)

6.4 Communication

EBPC has established a Communication Process (OMS-PRO-08) to describe the Company's approach for informing relevant internal and external stakeholders of the policies, goals, efforts and results of EBPC's Management Programs relating to safety, security and protection of the environment. EBPC has also established a Communication Register (OMS-PRO-08-REG-01) to manage its internal and external communication requirements.

6.4.1 Internal Communication Requirements

Internal communication requirements for the EMP are provided below. Per EBPC's Communication Process, their implementation (communication planning, scheduling, delivery, and evaluation) is set out in the Communication Register and the Manager, Operations & Engineering (EMP Program Owner) is responsible for ensuring they are implemented accordingly:

- Weekly update on EMP Program implementation to be presented in Weekly Staff Meetings and documented in the Staff Meeting Minutes Form (OMS-PRO-08-FRM-01)
- Annual Program awareness presentation provided to all employees
- Weekly update related to EMP implementation with focus on field work to be discussed in Weekly Operations Meeting and documented in Operational Team Meeting Minutes Form (POMM-PRG-01-PDR-31-FRM-01)

- Quarterly update on EMP implementation with a focus on OMS process requirements presented in quarterly Management Review Meetings
- EMP-related immediate or emerging updates communicated via EBPC internal memo or by initiating the Emergency Response Plan when warranted

6.4.2 External Communication Requirements

EBPC has established a Continuing Education and Liaison Program to implement its external communication requirements for the EMP.

The Continuing Education and Liaison Program includes the following required elements:

- Liaison with Agencies Involved in Emergency Response
- Communication with Persons Involved in Emergency Response
- Providing Continuing Education for Emergency Response

These requirements are described in more detail below and in EBPC's Stakeholder and Public Awareness Program (SPA), which has been established to ensure coordinated external communication and engagement across all Management Programs.

The Director, Legal & Regulatory Affairs must review and approve all drafts of external communication deliverables (i.e., regulatory, landowner, Third Party notifications; brochures; letters, etc.) prior to them being issued.

Per EBPC's Communication Process, the implementation of these requirements is set out in the Communication Register and the SPA, and the Manager, Operations & Engineering is responsible for ensuring they are implemented accordingly.

Liaison with Agencies Involved in Emergency Response

EBPC has used its Emergency Planning Zone to identify and established working relationships with agencies that may be involved in an emergency response on the Brunswick Pipeline. EBPC consulted these agencies in the development of its Emergency Response Plan. EBPC will initiate additional consultations with these agencies in the event of any material updates to its ERP.

These agencies are included as external Emergency Response Stakeholders in EBPC's Communication Register. The Communication Register also provides a description of EBPC's approach to conducting any required consultations with emergency response stakeholders.

An up-to-date contact list of these agencies is maintained in Annex D (Emergency Contacts) of the Emergency Response Plan.

Communication with Persons Involved in Emergency Response

In addition to consulting applicable agencies in the development and updating of its ERP, EBPC provides a Presentation on EBPC Facilities and Emergency Response (EMP-PRG-01-PPT-01) to stakeholders associated with an emergency response activity on the Brunswick Pipeline (Primary Emergency Response Stakeholders). This Presentation is identified as a communication deliverable in EBPC's Communication Register and includes the following information which is consistent with EBPC's ERP:

- Type and locations of Company facilities (with focus on identified risks);

- Potential emergency situations;
- All potential hazardous products transported and/or stored at Company facilities in significant volumes;
- Safety Data Sheets or similar information on the properties of products (mercaptan and natural gas);
- Spill control points (3 secondary containment odourant tanks);
- Key roles of all Company personnel and agencies involved in an emergency;
- Practices and procedures to be followed consistent with those specified in the EBPC's ERP; and
- EBPC contact information, including emergency phone number.

Providing Continuing Education for Emergency Response

EBPC has developed 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 hazards and emergency situations involving the pipeline, and the safety procedures to be followed in the case of an emergency.

EBPC uses its Emergency Planning Zone to identify the stakeholder groups with whom continuing education must be conducted. These stakeholder groups are listed EBPC's Communication Register which also includes details related to the required communication content, frequency and method of delivery.

EBPC has engaged a third-party service provider to maintain an up-to-date contact lists of all persons potentially affected by an emergency situation on the Brunswick Pipeline. The Manager, Operations & Engineering is responsible for the management of contractors engaged to assist with the maintenance of EPZ contact lists.

Stakeholder analysis

To ensure a coordinated approach to implementing its Continuing Education and Liaison Program, 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 above). This stakeholder analysis determines the continuing education and liaison activities the emergency response stakeholder groups receive.

Publishing Emergency Management Program & Emergency Response Plan

EBPC must publish the entirety of the EMP and ERP on its Company website for public viewing. EBPC may protect from publication, information:

- about an identifiable individual, including his or her name, phone number, email address, mailing address and medical condition;
- where there is a real and substantial risk that its disclosure will impair the security of pipelines, power lines, buildings, structures or systems, including computer or communications systems or methods employed to protect them;

- that, if disclosed, could reasonably be expected to result in a material loss or gain to a person affected by publication of the ERP or that could prejudice the person's competitive position;
- about the location of species at risk and heritage resources[1]; and
- about a person, such as a daycare, school, or hospital that the person requested be withheld from publication.

EBPC must replace any information in the published ERP or EMP that is protected from publication as described above by substituting it with a description of the nature of the protected information and a statement explaining why it is protected;

The EMP must be published in English and in French.

The published versions of the ERP and EMP must be updated any time the ERP or EMP are updated using EBPC's Management of Change Process.

6.5 Document Identification

EBPC has established and implemented a Document Identification Process (OMS-PRO-09A) to identify the documents the Company requires to meet its obligations under the Management System.

Document identification refers to EBPC's method for identifying the required Documents: new required Documents or revisions to existing EBPC Documents are identified during 1) EBPC's annual risk and hazard review; 2) EBPC's annual legal requirements review; 3) EBPC's quarterly Management Review meetings; and 4) on an ad-hoc basis, during the implementation of the Management System and the operation and maintenance of the Brunswick Pipeline.

The Manager, Operations & Engineering must ensure that all required documents related to this EMP Program are identified per the Document Identification Process.

6.6 Document Management

EBPC has established and implemented a Document Management Process (OMS-PRO-09B) to describe the Company's preparing, reviewing, revising and controlling of new and existing Documents the Company requires to meet its obligations under the Operations Management System. This includes the regular review of the EMP Program as set out in the Document Review Schedule outlined in the Document Management Process.

This Process also requires that any new or amended documents that will be used in frontline Pipeline operations, including applicable EMP documents, be submitted to the appropriate field-level employees, as identified by the Document Owner, for review to ensure that there is clarity

[1] Heritage resources includes cultural, historic, archaeological and paleontological resources.

related to the on-site application of the new or amended Document and any inconsistencies or conflicts to other field-level documents or activities are identified.

The Manager, Operations & Engineering must ensure that all EMP documents are managed in accordance with the Document Management Process.

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 and to ensure corrective and preventive actions are taken when deficiencies are identified.

The quality assurance and corrective action processes, as they apply to the EMP Program, are described below.

7.1 Inspecting and Monitoring

EBPC has established and implemented an Inspecting and Monitoring Process (OMS-PRO-10A) to describe the Company's approach to inspecting and monitoring its activities and facilities to evaluate the adequacy and effectiveness of its Management Programs and for taking corrective and preventive actions if deficiencies are identified.

Once required inspecting and monitoring activities are identified, EBPC uses the QA Register (OMS-PRG-01-REG-01) per its QA Program (OMS-PRG-01) to list all the required inspection and monitoring activities and their frequencies. EBPC schedules its inspection and monitoring activities in accordance with this Register and conducts them according to procedures developed for the inspection or monitoring activity.

The EMP specific inspection and monitoring requirements are outlined below. A detailed list of all quality assurance activities (including inspections and monitoring activities) associated with EMP legal requirements are set out in EBPC's Legal Requirements Register.

7.1.1 Inspections

EBPC carries out the following EMP inspections to ensure it can effectively respond to emergencies:

- Inspections to ensure preventive maintenance of pipeline infrastructure and/or facilities, including regularly scheduled sessions for operational testing and inventory
    - EBPC implements this inspection activity using its Pipeline Inspection Manager (PIM) Procedure (POMM-PRG-01-PDR-32)
- Inspections to ensure preventive maintenance of response equipment, including regularly scheduled sessions for operational testing and inventory
    - EBPC implements this inspection activity using its Pipeline Inspection Manager (PIM) Procedure (POMM-PRG-01-PDR-32)

7.1.2 Monitoring Activities

EBPC carries out the following EMP monitoring activity:

- Gas control monitoring (SCADA)

- EBPC implements this inspection activity using its Pipeline Control System (PCS) Oversight Procedure (PCS-PRG-01-PDR-01)

7.2 Evaluating Adequacy and Effectiveness

EBPC has established and implemented an Evaluating Adequacy and Effectiveness Process (OMS-PRO-10B) to describe the Company's approach to evaluating the adequacy and effectiveness of the Company's Management System Processes, and for monitoring, measuring and documenting the performance of the Management System Processes in meeting their intended outcomes and the Company's obligations under the Management System.

As Program Owner, the Manager, Operations & Engineering provides requested EMP Program implementation data to EBPC's Process Manager during the annual assessment of each adequacy and effectiveness measure.

7.3 Investigating and Reporting Incidents

EBPC has established and implemented the Investigating and Reporting Incidents and Near-Misses Process (OMS-PRO-11) for the reporting of hazards, potential hazards, incidents, near-misses and proactive activities, and for investigating incidents and near-misses. This Process describes EBPC's internal and external reporting requirements.

This Process also describes EBPC's use of the Incident Reporting Database (IRD), a data management system used for the internal reporting of hazards, potential hazards, incidents, near-misses and proactive activities, as well as for monitoring and analyzing the trends in hazards, incidents, near-misses, and proactive activities.

Reporting requirements related to emergency incidents

In the event of an emergency incident, the ERP and supporting Annexes A (ERP Emergency Levels and Response Table) and K (Incident Reporting and Notification Requirements) set out external incident reporting requirements to government departments and agencies and internal reporting requirements to corporate stakeholders.

Annual EMP Reporting Requirements – CER

As part of the reporting requirements set out in OMS-PRO-11 and above, the Manager, Operations & Engineering must ensure the following EMP specific reporting requirements are adhered to:

- By April 1 of each year, EBPC must submit to the CER the Company's ERP (one hard copy, one electronic copy) or a confirmation stating that no changes have been made to the ERP since the last ERP filing.
- By April 30 of each year, EBPC must submit to the CER a written confirmation from EBPC's Accountable Officer of the website link where the ERP and EMP have been published. The confirmation must state that EBPC has provided a link to the EMP Program information to the CER and to any interested person that has expressed to EBPC interest in the published EMP information.

- If any changes are made to either the published EMP or ERP website links, EBPC must submit written confirmation to the CER within 2 weeks of any changes to the links.
- Once annually, EBPC must submit to the CER an exercise plan, identifying the exercises the Company is planning for that year. The exercise plan must:
    - Include a range of exercises with varying degrees of complexity;
    - Be clear as to the stakeholders who are to be involved (e.g. identify whether the exercise is internal, external, and if it involves multi-agency/multi-jurisdictional stakeholders). Stakeholders may include police, fire departments, emergency medical services, and all other appropriate organizations (e.g. mutual aid partners, contractors, spill cooperatives, government departments and agencies, Indigenous groups, and persons who may be associated with an emergency response activity on or adjacent to the pipeline).
    - Identify exercise coordinator's contact information;
    - Identify planned or prospective dates and exercise locations;
    - Describe exercise scope and objectives;
    - Identify participants to be invited to the exercise;
    - Identify whether the CER will be requested to observe and/or participate in the exercise;
    - Identify whether the exercise will involve CER regulated or provincially regulated facilities; and
    - Identify exercises that have a security component that evaluate the effectiveness of EBPC's security incident response preparedness.

<u>Performance Measures Reporting – CER</u>

In addition to the above reporting requirements, annually, the Manager, Operations & Engineering must report on the following performance measures to the CER:

- Emergency Response Exercises: The total number of emergency response exercises conducted versus the total number of emergency response exercises planned for each of the following:
    - drills;
    - tabletop (i.e. mock) exercises;
    - functional (i.e. simulation) exercises; and
    - full scale (i.e. major) exercises.
- Communication: The number of liaison activities conducted versus the number of liaison activities planned.
- Training and Competency: The total number of company employees and contractors identified as having a role and responsibility during an emergency versus the total number of company employees and contractors that have up-to-date training to carry out their expected emergency management roles and responsibilities.
- Coordinating Operational Activities: The total number of company employees and contractors who have participated in emergency response exercises and drills versus the total number of company employees and contractors identified as having a role and responsibility in an emergency.

7.4 Conducting Audits

EBPC has established and implemented a Conducting Audits Process (OMS-PRO-12) to describe the Company's approach to audits pursuant to Sections 53 and 55 of the *Onshore Pipeline Regulations* (OPR). It outlines the process by which EBPC sources and manages an external auditor to complete an audit on its Management System and Programs and to ensure that its Pipeline is operated in compliance with its obligations under the *Canadian Energy Regulator Act*, the OPR, the terms and conditions of its Certificate, and any CER Orders. The Conducting Audit Process also describes how corrective actions will be managed for any deficiencies or non-compliances identified during audit activities.

Audits of this EMP must be completed at a minimum every 3 years. One year in advance of the program audit, the Manager, Operations & Engineering must review the EMP Program in accordance with the Document Review Schedule set out in the Document Management Process and implement any required document amendments and new documents prior to the scheduled date of the audit.

7.5 Records Management

EBPC has established and implemented a Records Management Process (OMS-PRO-13) to describe the Company's approach to generating, retaining and maintaining records, and for making those records accessible to EBPC employees who require them in the course of their work. EBPC records document the implementation of the Company's Operations Management System, including its Management Processes and Programs, and ensure activities and decisions related to the Emergency Management Program are documented.

EBPC's Pipeline Coordinator assists the Manager, Operations & Engineering with the management of all record requirements, including reviewing records for completeness, uploading records to SharePoint, and communicating any deficiencies to the Program Owner.

The following are specific records requirements for the EMP. These records must be kept on the Company's SharePoint site.

- EBPC must keep records of all education and liaison activities;
- EBPC must keep records of actions taken to prepare for emergencies, including:
    - Training records related to emergency preparedness (i.e. ICS training; program awareness training, etc.);
    - reports of completed emergency response exercises, including a summary of exercise debrief discussions/lessons learned;
    - records related to emergency response equipment (maintenance, storage, etc.); and
    - any continuous improvement changes made to the EMP (i.e. EMP program reviews).
- EBPC must maintain and keep records whenever the ERP has been initiated in response to an incident so that each incident may be analyzed. At a minimum, these records must include:
    - The date, location, and description of each event;
    - Any repair procedures used, including acceptance tests;

- Actions taken to respond to the emergency; and
- Debrief reports.

7.6 Action Management

EBPC has developed and established an Action Management Process (OMS-PRO-14) for taking corrective and preventive actions if deficiencies are identified as a result of the implementation of its Management System Processes, Programs, Procedures, Registers, Forms, and any other documents that fall under the Management System.

The Process describes EBPC's use of its Action Register (OMS-PRO-14-REG-01) to record, track and manage deficiencies and the corrective and preventive actions designed to correct the identified deficiency and prevent reoccurrence.

The Manager, Operations & Engineering must ensure any deficiencies identified during the implementation of this EMP Program are recorded in the Action Register and actioned accordingly.

8 ACT

The process below helps ensure EBPC acts on the quality assurance findings and any identified deficiencies in an effort to continually improve the Company's performance in meeting its obligations.

8.1 Management Review

EBPC has established and implemented a Management Review Process (OMS-PRO-15) for conducting quarterly Management Review Meetings and annual Management Review Meetings to review the adequacy and effectiveness of its Management System Programs and Processes and to ensure continual improvement in meeting the Company's obligations under the Management System.

The Manager, Operations & Engineering must provide EMP performance data on a quarterly and annual basis and address the Program's adequacy and effectiveness, and opportunities for continual improvement.