

COAL ASSETS AUSTRALIA

GLENCORE

Regional Asset HSEC Standard

6.0 Incident



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1 Purpose

Glencore Coal Assets Australia (GCAA) aims to develop and maintain a management culture that promotes the recognition, response, reporting and investigation of incidents, including near misses. This standard provides guidance for categorising and reporting of HSEC incidents so that:

- a) We are able to investigate and learn from incidents to prevent repeat events.
- b) Management and employees are able to make informed decisions to prevent re-occurrences.
- c) Industry incident recording and reporting regulatory standards are met.

Appropriate corrective actions are to be implemented for all incidents. Where beneficial, learnings from investigations are to be shared across the business, at all relevant levels, and across the industry when applicable.

Incident management systems are to include relevant response measures, recording and notification, and investigation processes, including root cause analysis, relevant to the incident consequence. This includes informing GCAA of incidents in a timely and accurate manner, to enable appropriate corporate reporting, with Operations providing essential information for all reported incidents.

2 Scope

This document provides the minimum HSEC incident reporting, notification and investigation requirements for GCAA and its Operations*. The requirements apply to all personnel, including managers, employees and contractors, at all levels, unless specifically excluded.

Where additional requirements or obligations are identified by an Operation they are to be included in their Health, Safety, Environment and Community (HSEC) Management System and maintained to an equivalent standard.



Note

The term ‘Glencore Coal Assets Australia and its Operations’ includes all mines, projects and administrative support services operating as part of Glencore Coal Assets Australia.

3 Document Map

This standard forms part of the GCAA HSEC Management System with supporting documents, directly relevant to this standard, shown in **Figure 3-1**.

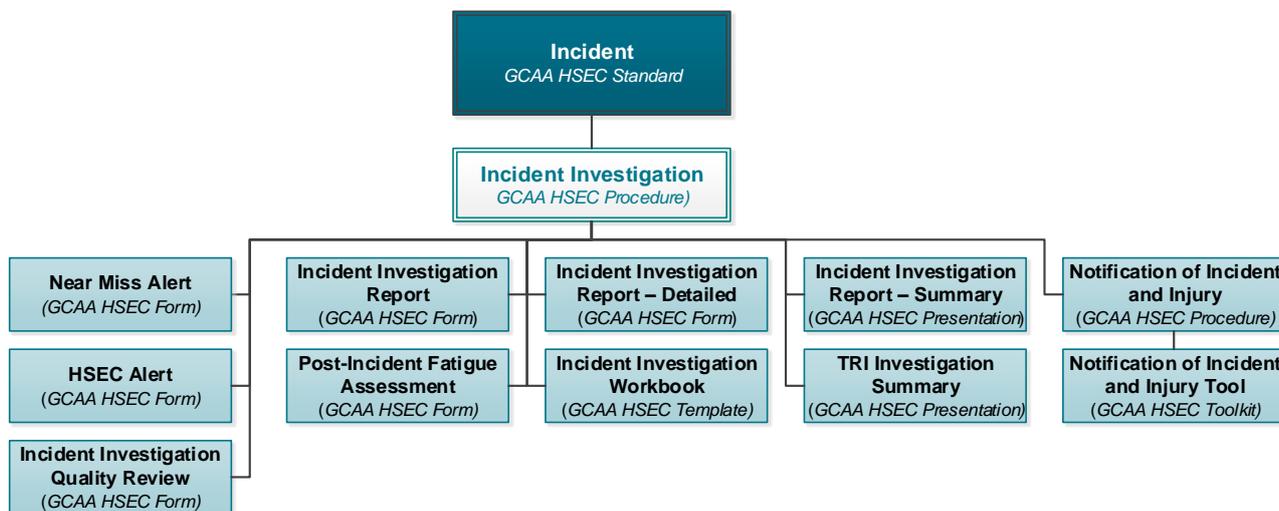


Figure 3-1– Incident document map

4 Overview

Operations are to develop and maintain an incident management system to identify, categorise and report HSEC incidents. As a minimum, the system is to comply with relevant legislated requirements and include:

- a) Processes for immediate response to incidents.
- b) Processes to manage scene security and preserve information.
- c) Classification, recording and reporting of all HSEC incidents using CMO.
- d) Notification requirements (as required by relevant legislation and corporate timeframes).
- e) Investigation of incidents to a depth which identifies the underlying causes and contributing factors, relevant to the actual or potential consequence of the incident.
- f) Communication of any changes resulting from investigations and lessons learnt.
- g) Developing, implementing and monitoring the effectiveness of corrective and preventative actions using the change management process where applicable.
- h) Processes to maintain quality of incident data.
- i) Collation and analysis of incidents and investigation data to identify trends and assess the effectiveness of current HSEC management.



Note

In all emergency situations, the primary focus is the protection of the safety and health of all persons and minimising the impact on the environment.

5 Reporting and Notification

Reporting and investigation requirements are determined according to their most likely potential consequence. The consequence is based on the [Glencore Risk Matrix](#), as detailed in GCAA Standard [FIN – Risk Management](#).



Note

- *If doubt exists about a situation, legal advice and support should be sought to determine if legal privilege should be invoked.*
- *In the event of an incident, Operations are to complete all relevant legislated and GCAA reports and notifications within stated timeframes.*

Operations are to develop and maintain a process for all relevant legislated incident reporting and notification timeframe requirements. In addition, reporting and recording of all HSEC incidents, including near misses, are to be actively encouraged and are to align with GCAA reporting and notification requirements, as detailed in [Appendix B - GCAA HSEC Incident Notification and Reporting](#).

For New South Wales Operations only, refer to GCAA Procedure [HSEC – Notification of Incident and Injury](#) (and associated toolkit) to assist the Operation to determine whether an incident or injury is notifiable to the inspectorate.

Operations are to record initial incident data in CMO (within two working days) to allow retrieval of records for analysis and reporting. Incidents to be reported are to comply with legislated requirements, and as a minimum include:

- a) HSEC Hazards.
- b) Near misses.
- c) Injury, illness or disease.
- d) Environmental incidents.

- e) Equipment damage or loss.
- f) Community complaints, issues or concerns.
- g) Impact to corporate image or reputation.
- h) Non-compliance issues.

**Note**

A Risk Category 4 or 5 potential incident could be indicated where evasive action was taken to avoid an incident. Incidents of this nature are to be reported immediately.

Operations are to communicate HSEC incidents and lessons learnt to employees, contractors and relevant stakeholders when considered appropriate. The most effective method of communication, relative to the incident should be used. For specific communications methods, refer to GCAA Standard *HSEC - Leadership, Culture and Accountability*.

5.1 GCAA Reportable Incident Notification

GCAA reportable incidents are classified as any of the following:

- a) Fatalities.
- b) Lost Time Injuries (LTI).
- c) Restricted Work Injuries (RWI).
- d) Medical Treatment Injuries (MTI).
- e) Health exposure exceedance (HEE), only for respirable dust, silica, and diesel particulate matter.
- f) Environmental incidents (Category 2 and above).
- g) Community complaints.
- h) Legislative directives.
- i) Departmental notifications.
- j) High Potential Reportable Incidents (HPRIs).

When any reportable incident occurs, a record is to be created in CMO. A *GCAA Reportable Incident Notification Report* is to be generated and forwarded to the *GCAA Reportable Incident Notification* distribution list.

As a minimum, the relevant distribution lists are to include:

- a) Chief Operating Officer (COO) direct reports.
- b) Senior Management.
- c) General Managers.
- d) Operations Managers.
- e) Environment and Community Managers.
- f) Health, Safety, and Training Managers.

**Note**

- *For reporting of a fatality, the GCAA Reportable Incident Notification Report is not to be used. The Operations Manager is to report the fatality to the relevant Director of Operations to establish an appropriate notification process.*
- *The email distribution is not applicable for HPRIs as they are communicated through the HSEC Alert process.*

6 Investigation

The investigation type and category is to be based on the potential consequence of the incident. The aim of the investigation is to establish the facts, identify root cause(s) and contributing factors, and to recommend corrective actions to prevent a reoccurrence.

All incident investigation corrective actions are to be verified for effectiveness within six months of the incident.



Note

Corrective actions refer to actions that directly address the root cause of the incident.

6.1 HSEC Investigation Types

GCAA uses three types of HSEC Investigation. The relevant investigation type is based on the potential consequence which is determined from the incident *Risk Category*, based on the *Glencore Risk Matrix* (refer to GCAA Standard *FIN – Risk Management*). Once the *Risk Category* is identified, the relevant type of investigation can be identified using **Table 6-1**.

Investigation Type	Risk Category (From the GCAA Risk Matrix)				
	1	2	3	4	5
Basic (5 Whys)					
Intermediate			#1		
Detailed					

Basic → *Detailed*
 Investigation detail

#1 All Environment Risk Category 3 incidents require a Detailed investigation

Table 6-1 – Minimum HSEC investigation types for risk categories

For all incident investigations, Operations are to follow GCAA Procedure *HSEC - Incident Investigation* and use GCAA Form *HSEC - Incident Investigation Report* to record the incident information (or enter information directly into CMO). The procedure provides consistent information and processes to identify the root cause(s) of the incident, and includes investigation by the appropriate level of *Line Management*. It also includes a process for developing and implementing appropriate corrective actions to prevent reoccurrence.

6.1.1 Investigation Review

Investigation reporting includes the review and approval process for all types of investigation, which includes review of incident details such as:

- Verifying the quality of the investigation.
- Confirming injury information and treatment details are up to date and correct.
- Confirming the potential *Risk Category*.
- Verifying that all corrective actions address the actual root cause and do not introduce new hazards.

- e) Verifying that all action wording (corrective actions and any other related actions) is suitable and correctly structured.
- f) Confirming that due dates are within achievable and realistic timeframes.

6.2 Basic Investigations

A basic investigation is to use the *5 Whys* methodology and should typically be led by the *Line Supervisor*. The investigation should include personnel directly involved or those who have knowledge of the process or task being undertaken at the time of the incident.

For a basic investigation the *Lead Investigator* is to:

- a) Complete and submit the report (paper report or entered directly into CMO) by the end of the shift on which the incident occurred.
- b) Provide feedback to personnel involved in the incident.

The *Lead Investigator* is to prepare incident and investigation details for presentation at future pre-shift briefings or other meetings, at a suitable time determined by the Operation.

6.2.1 Reporting

The *Lead Investigator* is to complete the basic investigation report by the end of the shift, where possible. The relevant superintendent (or equivalent) is to approve the report within 10 days of the incident. This is to include quality aspects identified in **Section 6.1.1**.

6.3 Intermediate Investigations

The *Line Supervisor* is to begin the investigation and collate initial information and evidence. Initial incident information is to be entered into CMO within 24 hours of the incident.

The *Operations Manager* is to nominate a suitable *Lead Investigator* to continue the investigation, with consideration to the:

- a) Level of complexity of the incident.
- b) Independence of the investigator from the department or operation.
- c) Number of repeat or similar incidents in the department.
- d) Experience of the investigator.
- e) Operational requirements.

The *Lead Investigator* is to identify a suitable team which should consist of personnel who have knowledge of the process or task being undertaken at the time of the incident. The investigation team should consider the inclusion of the following roles:

- a) Health and Safety or Environment and Community expert(s).
- b) Technical expert(s) (internal or external as applicable).
- c) ICAM trained investigator (*ICAM Champion*).
- d) Supervisors.
- e) Workforce Representative.

The *5 Whys* methodology is to be used for all intermediate investigations. In addition, the investigation is to include direct oversight by the *Line Manager*. Where considered necessary, the investigation team is to be actively involved in:

- a) Identification and collection of additional information.
- b) Completion of the timeline of events.
- c) Analysis of the 5 Whys.

- d) Identification of corrective actions.

For intermediate investigations, the *Lead Investigator* is to:

- a) Complete and submit the report (paper report or directly into CMO) within five calendar days of the incident.
- b) Provide feedback to personnel involved in the incident.

The *Lead Investigator* is to prepare incident and investigation details for presentation at future pre-shift briefings or other meetings, at a time to be determined by the Operation.

Note



The relevant *Line Manager* is to approve any extensions to the five day time-frame for submission of the report.

6.3.1 Reporting

The relevant *Line Manager* is to review the intermediate investigation report within 10 days of the incident. The *Department Manager* is to approve the report within 15 days of the incident. Both review and approval are to include quality aspects identified in **Section 6.1.1**.

Where an incident results in a *Total Recordable Injury (TRI)*, a *TRI Investigation Summary Presentation* is to be prepared in addition to the intermediate investigation report. The Operation is responsible for presenting the *TRI Investigation Summary Presentation* to the GCAA Senior Leadership Team.

6.4 Detailed Investigations

Detailed investigations are to be led by an ICAM trained investigator from the Operation or external (external to the Operation or GCAA). The ICAM methodology is to be used for all detailed investigations.

The investigation team should consist of a cross section of personnel relevant to the type of incident. This may include for example:

- a) Department Superintendent.
- b) Health and Safety or Environmental and Community expert(s).
- c) Technical expert(s).
- d) *Open Cut Examiner (OCE)*, *Explosion Risk Zone (ERZ) Controller*, or other supervisory personnel (where relevant).
- e) Workforce Representative.

Note



For detailed investigations involving a fatality, an independent investigation support person (independent of the Coal Department) will be appointed by Glencore within 72 hours of the incident.

A *detailed investigation* is applicable for:

- a) A potential Risk Category 4 or 5 incident (*High Potential Risk Incident (HPRI)*).
- b) An actual Risk Category 4 or 5 incident.

6.4.1 High Potential Risk Incidents



Note

- *High Potential Risk Incidents are to be shown the same level of urgency as for an actual Risk Category 4 or 5 incident.*
- *The HPRI Investigation Report - Summary is a presentation style summary of the full HPRI Investigation Report. Both versions of the report are to be maintained and any changes in one reflected in the other.*

GCAA and the *Glencore Coal Department* hold HPRI review meetings which are scheduled monthly and attended by members of the *GCAA Senior Leadership Team*, other Directors, and General Managers. The aim of the meetings is to review any HPRI draft reports, identify *Mandatory Actions*, and approve the *Incident Investigation Report - Summary* presentation. Any changes identified during these meetings are to be reflected in the *Incident Investigation Report - Detailed* and the *Incident Investigation Report - Summary (presentation)* by the *Lead Investigator*.

6.4.1.1 High Potential Risk Incident Reporting

The *Lead Investigator* is responsible for providing the *Incident Investigation Report - Summary* presentation to the *Operations Manager* within 10 days of a HPRI incident. The *Operations Manager*, with support from the *Lead Investigator*, is responsible for presenting the *Incident Investigation Report - Summary* to the relevant *Director of Operations*, *General Manager*, and Health and Safety or Environment and Community General Manager within 14 days of the incident. The purpose of the presentation is to review and authorise progression of the draft report to the GCAA HPRI meeting.

Reviews are based around the *Incident Investigation Report - Summary* presentation rather than the *Incident Investigation Report - Detailed*. The *Lead Investigator* is responsible for maintaining alignment of the *Incident Investigation Report - Summary* and the *Incident Investigation Report - Detailed*.

An overview of the *High Potential Risk Incident (HPRI)* timeline is shown in **Figure 6-1**. All HPRI's are reported by the Operation through to Glencore following the established process. The reporting process includes reviews and approvals through the management structure including the relevant *Director of Operations*, relevant *GCAA Senior Leadership Team* members, and the *Glencore Coal Department*.

The *Operations Manager* and the *Lead Investigator* are to present the *Incident Investigation Report - Summary* presentation to the *GCAA Leadership Team*. The relevant Director is to add the presentation to the agenda of the next scheduled GCAA and the *Glencore Coal Department HPRI Meeting*, immediately following finalisation of the *Incident Investigation Report - Summary*. Where considered applicable, *Mandatory Actions* and realistic implementation timeframes are to be identified at the meeting.



Note

Mandatory Actions are specific corrective actions, identified by the GCAA Senior Leadership Team, which are considered essential to prevent a repeat Risk Category 4 or 5 incident (actual or potential).

Where *Mandatory Actions* are identified by the *GCAA Leadership Team*, the actions are to be issued as a GCAA directive to each affected Operation. The *Mandatory Actions* are only to be released after the *Incident Investigation Report - Summary* is presented to the GCAA and the *Glencore Coal Department HPRI Committees*. The *Mandatory Actions* are to be tracked and reported for implementation through CMO.

The relevant *Operations Manager* and *Director of Operations* is responsible for presenting the *Incident Investigation Report - Summary* to the *Glencore Coal Department HPRI Committee*. The presentation is to be added to the agenda of the next scheduled meeting after GCAA finalisation of the report.

The *Glencore Coal Department* are responsible for presenting the *Incident Investigation Report - Summary* to Glencore within 45 days of the incident.

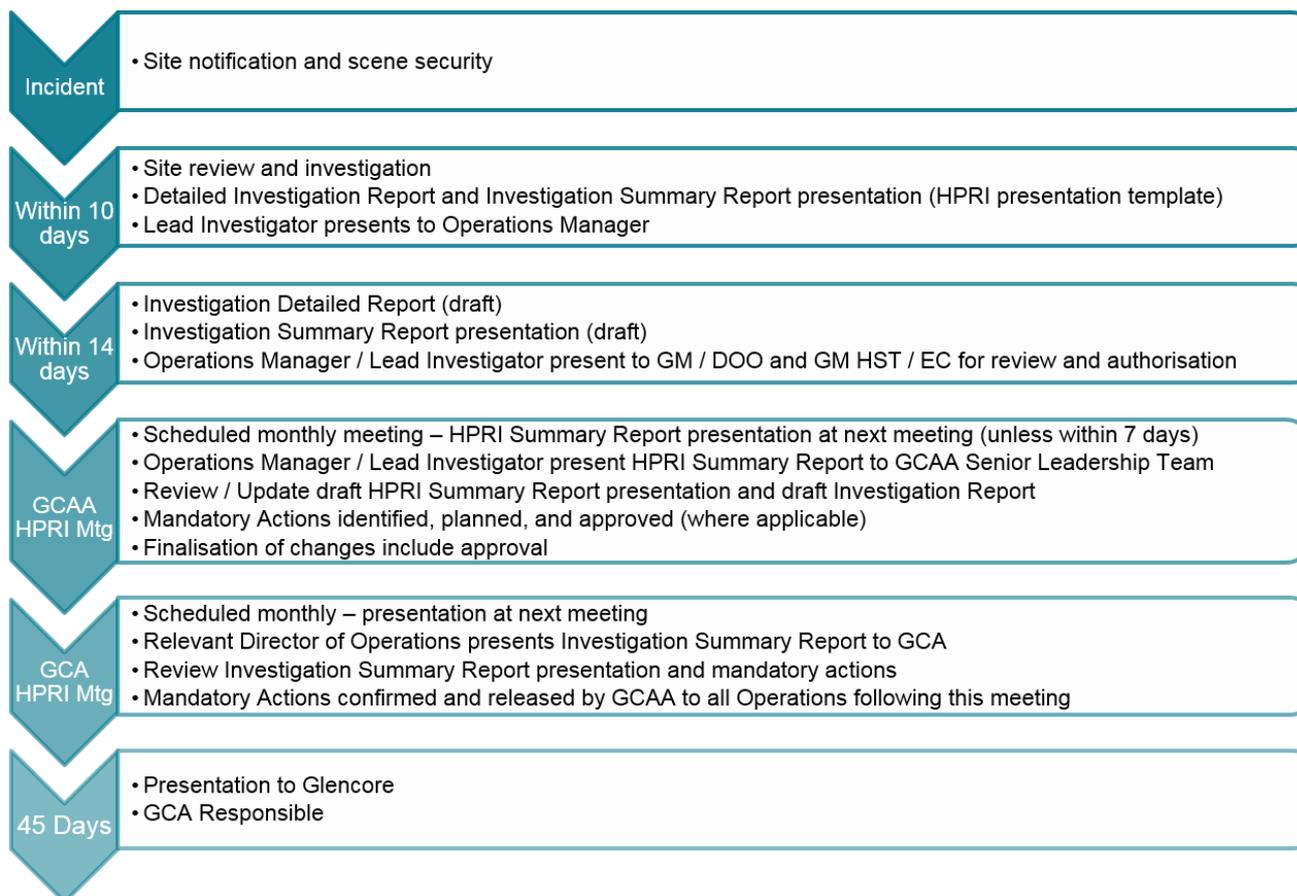


Figure 6-1 – HPRI timeline overview



Note

For New South Wales Operations, if the investigation is part of a Causal investigation process, the reporting timelines will be at the discretion of the investigation team. However, every effort is to be made to meet the GCAA investigation timelines.

6.4.2 Actual Risk Category 4 or 5 Incident



Note

- The requirements to maintain legal professional privilege should be considered based on Glencore, GCA and legal counsel advice. All associated requirements should be communicated, implemented and monitored for compliance during the course of the investigation.
- Reporting timeframes may be affected due to legal privilege or other external influences.

All HSEC incidents with actual consequences of Risk Category 4 and 5 are to be reported to Glencore (through GCAA and the *Glencore Coal Department* management) within 24 hours. The 24 hour incident notification should contain only basic confirmed information to provide an understanding of the incident and should not include opinions.

GCAA, the *Glencore Coal Department*, and Glencore HSEC and Legal, are to determine the purpose, nature and scope of the investigation to be conducted in relation to the incident. Where possible, the investigation is to start within 72 hours of the incident. Where applicable, legal counsel may direct the requirements of an investigation.

Glencore is to nominate an independent investigation support resource, from another Glencore Department (external to Coal), who is to form part of the incident investigation team. They should be on-site within 72 hours after the incident.

Unless legal privilege has been invoked, or for New South Wales Operations a causal investigation has been invoked, the investigation is to be completed and reported within 30 days of the incident. The *Lead Investigator* is to present findings to the relevant *Director of Operations*, *General Manager*, and HST or E&C General Manager within 30 days of the incident.

The *Lead Investigator* is responsible for presenting the *Incident Investigation Report - Summary* to the *GCAA Leadership and Operations Managers Meeting*, immediately following finalisation of the investigation report.

The *GCAA Chief Operating Officer* is accountable for providing a presentation to the Glencore HSEC Committee at the next scheduled meeting after finalisation of the report. The presentation may involve the *Lead Investigator*, at the discretion of the *GCAA Chief Operating Officer*.

6.5 Data Quality and Integrity

Operations are to develop a process to review incident investigation quality and data integrity using GCAA Form *HSEC – Incident Investigation Quality Review* or an equivalent standard. The *HST Manager* is to manage the review process through the assurance plan. The review is to include quality checks to confirm:

- a) Investigation details are complete and accurate.
- b) Notifications and reporting is completed within the stated timeframes.
- c) Proposed actions are relevant to the investigation objectives.
- d) Due dates for implementation of actions are appropriate.
- e) Review and approval of the incident investigation has been completed by the appropriate persons.

6.6 Lessons Learnt

Lessons learnt from relevant incident investigations, including internal and external incidents, and *Mandatory Actions* (where applicable) are to be communicated to appropriate employees and contractors and shared throughout the business.

Lessons learnt are to be shared through the use of HSEC Safety Alerts, the *Incident Investigation Report - Summary*, and any other relevant forums such as the Operations Managers meetings and HSEC Managers meetings.

7 Resources and Training

Operations are to provide training and resources for employees and contractors to enable HSEC incidents to be managed effectively as follows:

- a) All employees and contractors, during induction, are to receive appropriate training in the HSEC incident management process.
- b) Personnel selected to facilitate detailed incident investigations are to be trained and competent in ICAM.
- c) Supervisors and other personnel required to investigate internal incidents should complete incident investigation training.

Lead Investigators are to maintain their skills through the ongoing involvement or facilitation of detailed investigations, professional development activities, and the coaching or peer review process.

Each Operation is to identify personnel to perform the role of a *Lead Investigator*. A maximum of three per site is recommended to assist with maintaining the required skill levels. The following roles are suggested as typical *Lead Investigators*:

- a) Health, Safety and Training Manager.
- b) Environment Manager.
- c) Engineering Manager.
- d) Risk and Compliance Manager.

Ongoing professional development sessions are to be completed for all skill levels and those responsible are required to actively participate in this process.

GCAA minimum training and refresher requirements are identified in the [GCAA Course Register](#), refer to GCAA Standard [HSEC - Training](#) for more details.

8 Document Information

Relevant legislation, standards and codes is to be regularly reviewed and monitored for updates and should be included in the site compliance register for tracking and management. Related documents and reference information in this section provide the linkage and source to develop and maintain the site compliance register. For additional information, refer to GCAA Standard *HSEC - Documents and Records*.

8.1 Definitions

Terms and definitions are detailed in the GCAA Guideline *HSEC – Definition Guideline*.

8.2 Related Documents

Related documents, listed below, are documents directly related to or referenced from this document.

Reference	Type	Title
G HSEC POL 0001	Glencore Policy	Health and Safety Policy
G HSEC GDL 0002	Glencore Guideline	HSEC Incident Reporting and Investigation
GCAA-625378177-10524	GCAA Framework	GCAA HSEC Management System Framework
GCAA-625378177-9992	GCAA HSEC Standard	Documents and Records
GCAA-625378177-9990	GCAA HSEC Standard	Training
GCAA-625378177-9976	GCAA HSEC Standard	Leadership, Culture and Accountability
GCAA-625378177-2844	GCAA FIN Standard	Risk Management
GCAA-625378177-13717	GCAA Guideline	GCAA HS Definition Guideline
GCAA-625378177-15183	GCAA HSEC Procedure	Notification of Incident and Injury (NSW)
GCAA-625378177-10394	GCAA HSEC Procedure	Incident Investigation
GCAA-625378177-10439	GCAA HSEC Form	Incident Investigation Report
GCAA-625378177-10438	GCAA HSEC Form	Incident Investigation Quality Review
GCAA-1299732908-48	GCAA Template	Near Miss Alert
GCAA-1299732908-23	GCAA Template	HSEC Alert
GCAA-1299732908-24	GCAA Template	Incident Investigation Report - Summary
GCAA-1299732908-50	GCAA Template	TRI Presentation Report
GCAA-1299732908-25	GCAA Template	Incident Investigation Report - Detailed
GCAA-625378177-13822	GCAA Register	GCAA Course Register

Table 8-1 – Related document information

8.3 Reference Information

Reference information, listed below, is directly related to the development of this document or is referenced from within this document.

Reference	Title
WHSMA13(NSW)	Work Health and Safety (Mines and Petroleum Sites) Act 2013 (NSW)
WHSMPSR14(NSW)	Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 (NSW)

Reference	Title
WHS A11	Work Health and Safety Act 2011 (NSW)
WHS R17	Work Health and Safety Regulation 2017 (NSW)
CMSHA 99	Coal Mining Safety and Health Act 1999 (QLD)
CMSHR 17	Coal Mine Health and Safety Regulation 2017 (QLD)
EP Act 1994	Environmental Protection Act 1994 (QLD)
POEO Act 1997	Protection of the Environment Operations Act 1997 (NSW)
CIP	Causal Investigation Policy (NSW only)

Table 8-2 – Document reference information

8.4 Document Change Information

Full details of the document history are stored electronically in the document library, by version, on the intranet. A summary of the current change is provided below.

Version	Date	Change Summary
5.0	10 May 2018	Content review and update including: <ul style="list-style-type: none"> - 3.0 Updated document map to reflect new GCAA procedures and forms - New document owner to allow for correct approval workflow process - Replaced CMO for XstraSafe / SiteSafe throughout - 5.0 added reference to notification procedure for NSW Operations - 5.1 added reporting and notification details - 6.1-6.4 added new section to clarify GCAA Reportable Incident Notification requirements and Investigation Types (basic, intermediate, and detailed) - 6.5 Removed Appendix C (HPRI) and expanded into text - 8.2 Updated NSW Mining Legislation references - Removed risk matrix (previous Appendix A) and referenced to GCAA Standard to prevent duplication of risk information - Corrected formatting of appendix information into approved GCAA format - Changes Terms and definitions to match guideline
4.0	25 Nov 2016	Refer to Change Management for details
3.0	29 Dec 2015	Refer to Change Management for details
2.0	15 Feb 2015	Refer to Change Management for details
1.0	10 Nov 2014	Refer to Change Management for details

Table 8-3 – Document change information

Appendix A - Environmental Incident Risk Category Matrix

Environmental Incident Risk Category Matrix												
Cat	Glencore Definition	Water/Tailings	Hydrocarbon/ Chemicals	Noise	Blast Vibration/ Overpressure/ Fly rock	Blast Fume	Air Quality	Odour	Subsidence	Land Clearing	Effluent / Sewage	Waste and Other
Nil Cat	Potential environmental incident, hazard, near miss or actual incident resulting in no environmental harm.	<ul style="list-style-type: none"> Spill of dirty / mine affected water or tailings on-site into a drainage line or water body in a mine water catchment requiring very minor or no remediation. Spill of raw or potable water contained on-site <50 kL (the intent of this is to capture a loss of resource). 	<ul style="list-style-type: none"> Inappropriate storage of chemicals or fuels. Spill to the ground or in an on-site water body of less than 20 L. Spill underground or workshop area* of less than 205 L. Spill contained within a sealed, bunded (AS 1940 Standard) area (<1,000 L). 	<ul style="list-style-type: none"> Failure of key site controls that could lead to non-compliance. Preliminary/warning noise alarms not responded to in accordance with site TARP. 	<ul style="list-style-type: none"> Failure to follow Operation specific pre-blast procedures. 	<ul style="list-style-type: none"> Level 2 blast fume off-site 	<ul style="list-style-type: none"> Failure of key site controls that could lead to non-compliance. Preliminary/warning dust alarms not responded to in accordance with site TARP. 	N/A	N/A	<ul style="list-style-type: none"> Technical breach of GDP e.g. GDP process not completed correctly, not gaining all approval signatures, inspections not completed, ESC not implemented. Causing no environmental harm. 	<ul style="list-style-type: none"> On-site Sewage Treatment Plant and storage not working within acceptable limits/ criteria causing no environmental harm. Sewage spill on-site less than 200 L and causing no environmental harm. 	<ul style="list-style-type: none"> Waste bin overflowing. Failure to utilise or provide proper waste receptacles in a work area.

Environmental Incident Risk Category Matrix												
Cat	Glencore Definition	Water/Tailings	Hydrocarbon/ Chemicals	Noise	Blast Vibration/ Overpressure/ Fly rock	Blast Fume	Air Quality	Odour	Subsidence	Land Clearing	Effluent / Sewage	Waste and Other
Cat 1	No lasting environmental damage or effect. Requires minor or no remediation.	<ul style="list-style-type: none"> Dirty Water: Minor exceedance in water quality criteria during a licensed discharge causing minor or no remediation. Spill of dirty / mine affected water or tailings on-site into a drainage line or water body in a clean water catchment requiring very minor or no remediation. Spill of raw or potable water contained onsite ≥50kL. 	<ul style="list-style-type: none"> Spill to the ground other than in an open cut work area or site water body of 20 L - 205 L. Spill in an open cut pit of 20 L - 1,000 L that requires minor or no remediation. Spill underground or workshop area* of 205 L - 1,000 L. Spill contained within a sealed, bunded (AS 1940 Standard) area (>1,000 L). 	<ul style="list-style-type: none"> One-off exceedance of noise criteria for a one monitoring period from attended monitoring. Preliminary/warning noise alarms not responded to in accordance with site TARP and leads to community complaint and/or site noise levels above compliance limits. 	<ul style="list-style-type: none"> At nominated blast monitoring locations for sensitive receivers. Blasts >115dB(L) or >5mm/s at a sensitive receiver. Failure to comply with any other blast related conditions in an approval (e.g. maximum number of blasts per day, blasting hours restrictions). Failure to monitor blast event. 	<ul style="list-style-type: none"> Visible blast fume (Level 3/4/5 rating) on-site. For offsite: NSW - EPL Boundary and designated blast clearance zone, QLD - ML Boundary. 	<ul style="list-style-type: none"> Visible dust emissions (including spon com dust) carried off-site. Preliminary/warning dust alarms not responded to in accordance with site TARP and leads to community complaint and/or site dust levels above compliance limits. 	<ul style="list-style-type: none"> Strong odour (including spon com odour) originating on-site that is noticeable off-site. 	<ul style="list-style-type: none"> Unplanned subsidence or impacts outside approved performance criteria that has no lasting impact or requires minor or no remediation, and is reportable externally. 	<ul style="list-style-type: none"> Unauthorised disturbance to vegetation or ground on-site within planned mine disturbance footprint. Breach of Permit to Clear conditions requiring minor or no remediation. 	<ul style="list-style-type: none"> Sewage spill within a contained on-site catchment that can be remediated greater than 200 L and less than 2,000 L. On-site Sewage Treatment Plant and storage not working within acceptable limits / licence criteria for a sustained period (e.g. >1 week). 	<ul style="list-style-type: none"> Hazardous/ regulated waste disposed of in the incorrect receptacles causing no lasting environmental damage or effect, requiring minor or no remediation. Where on-site waste disposal is permitted - incorrect disposal of hazardous/regulated waste onsite requiring minor or no remediation.

Environmental Incident Risk Category Matrix												
Cat	Glencore Definition	Water/Tailings	Hydrocarbon/ Chemicals	Noise	Blast Vibration/ Overpressure/ Fly rock	Blast Fume	Air Quality	Odour	Subsidence	Land Clearing	Effluent / Sewage	Waste and Other
Cat 2	Short-term impact. Requires minor remediation.	<ul style="list-style-type: none"> Any discharge or release off-site deemed to have caused a minor reversible environmental impact. Spill of dirty water / mine affected water on-site into a drainage line or water body in a clean water catchment which has caused a short term impact or requires minor remediation. 	<ul style="list-style-type: none"> Spill to an off-site water body deemed to have caused a short term impact requiring minor remediation. Spill to the ground (other than in an open cut work area) greater than 205 L. Spill in an open cut work area greater 1,000 L that requires minor remediation. Spill underground or workshop area* greater than 1,000 L requires minor remediation (excludes solcenic emulsions). 	<ul style="list-style-type: none"> Sustained exceedance of licence or approval conditions leading to non-compliance. Preliminary/warning noise alarms not responded to in accordance with site TARP and leads to multiple community complaints and/or sustained site noise levels above compliance limits. 	<ul style="list-style-type: none"> Exceedance of licence or approval conditions (e.g. >120 dB(L) or 10 mm/s at a sensitive receiver. Non-compliance with approval conditions regarding consecutive blasts (QLD) or blast % >5% for Vib and OP (NSW). Exceedance of infrastructure blast limits (eg Transmissions towers) as prescribed in approvals. Fly rock going off-site and/or causing damage to external property or the environment. Systematic failure to monitor multiple blast events. 	<ul style="list-style-type: none"> Excessive visible blast fume (Level 3/4/5 rating) carried off-site impacting on sensitive receivers or leading to complaints. For offsite: NSW – EPL Boundary and designated blast clearance zone, QLD - ML Boundary. 	<ul style="list-style-type: none"> Sustained visible general mine dust carried off-site. Sustained spon com emissions leaving site unmanaged. Preliminary/warning dust alarms not responded to in accordance with site TARP and leads to community complaints and/or site dust levels above compliance limits and/or regulator investigation. 	<ul style="list-style-type: none"> Strong odour (including odour generated from unmanaged spon com) originating on-site leading to: <ul style="list-style-type: none"> multiple community complaints from an event; a series of odour complaints from an ongoing issue; odour emissions that trigger an a regulator investigation. 	<ul style="list-style-type: none"> Unplanned subsidence or impacts outside approved performance criteria that has short term impact and requires minor remediation. 	<ul style="list-style-type: none"> Unauthorised disturbance to vegetation or ground on-site outside of planned mine disturbance footprint requiring minor remediation. Unauthorised disturbance/clearing of vegetation off-site. 	<ul style="list-style-type: none"> Sewage spill within on-site catchment that can be remediated greater than 2,000 L. Sewage spill or discharge off-site having short term impact requiring minor remediation. 	<ul style="list-style-type: none"> Incorrect disposal of hazardous/ regulated waste offsite resulting in minor remediation or leading to regulatory action. Where onsite waste disposal is permitted - systematic incorrect disposal of hazardous/ regulated waste onsite requiring minor remediation.
Cat 3	Medium-term (<2 years) impact. Requires moderate remediation.	Assess impact, effect and time scale for remediation against Glencore Cat 3 definition.										

Environmental Incident Risk Category Matrix												
Cat	Glencore Definition	Water/Tailings	Hydrocarbon/ Chemicals	Noise	Blast Vibration/ Overpressure/ Fly rock	Blast Fume	Air Quality	Odour	Subsidence	Land Clearing	Effluent / Sewage	Waste and Other
Cat 4	Long-term (2 to 10 years) impact. Requires significant remediation.	Assess impact, effect and time scale for remediation against Glencore Cat 4 definition.										
Cat 5	Environmental damage or effect (permanent; >10 years). Requires major remediation.	Assess impact, effect and time scale for remediation against Glencore Cat 5 definition.										
<p>* A 'workshop area' includes covered and exposed sealed areas; both of which must drain to a functioning and appropriately sized oil and grease separator system.</p> <p>Note: if it is unclear from the matrix and Cat 1-5 tabs how an incident needs to be classified then the Operation should assess the impact of the incident against the Glencore Cat 1-5 definitions. The EC GM can upgrade an incident category at their discretion if there has been repeated failures of the same controls (resulting in repeated lower category incidents over a short period of time).</p>												

Appendix B - GCAA HSEC Incident Notification and Reporting

Incident Category	Action by	Person Involved	Supervisor / Supt	Operations Manager ^{#6}		General Manager / Director	GCAA	
	Recipient	Supervisor and Superintendent	Department Manager, Operations Manager and E&C / HST Manager	General Manager and Director	General Manager E&C / HST	Chief Operating Officer	GCA	Glencore (Baar) GCA responsible
Potential ^{#1}								
High Potential Risk Incident (HPRI) (Category 4 or 5)	Notification	Verbal (Immediate)	Verbal (Immediate)	Verbal (As soon as possible, but within 24 hours)	Verbal (As soon as possible, but within 24 hours)	Verbal (As soon as possible, but within 24 hours)	Verbal (72 hours)	N/A
	Reporting	N/A	Complete Incident Investigation Report – Initial (Part 1 only) Before end of shift	HSEC Alert 48 hours Incident Investigation Reports (Detailed and Summary) 30 days	HSEC Alert 48 hours Incident Investigation Reports (Detailed and Summary) 30 days	N/A	HSEC Alert within 48 hours to Department Incident Investigation Reports (Detailed and Summary) 40 days	Glencore HSEC Incident Report Form – A & B - 72 hours, C & D 15 days Incident Investigation Report – Detailed 45 days ^{#3}
Near Miss Reportable Incident (NMRI) (Category 1,2 or 3)^{#7}	Notification	Verbal (Immediate)	Verbal (as soon as possible)	N/A	N/A	N/A	N/A	N/A
	Reporting	N/A	Complete Incident Investigation Report – Initial Before end of shift	N/A	N/A	N/A	N/A	N/A

**Glencore Coal Assets Australia
Standard**

6.0 Incident

Incident Category	Action by	Person Involved	Supervisor / Supt	Operations Manager ^{#6}		General Manager / Director	GCAA	
	Recipient	Supervisor and Superintendent	Department Manager, Operations Manager and E&C / HST Manager	General Manager and Director	General Manager E&C / HST	Chief Operating Officer	GCA	Glencore (Baar) GCA responsible
Actual #2								
Category 4 or 5 (Major or Catastrophic Incident)	Notification	Verbal (Immediate)	Verbal (Immediate)	Verbal (Immediate)	Verbal (Immediate)	Verbal (Immediate)	Verbal (Immediate)	Verbal (Immediate)
	Reporting	N/A	Complete Incident Investigation Report – (Part 1 only) before end of shift	HSEC Alert 48 hours Incident Investigation Reports (Detailed and Summary) 30 days ^{#4}	HSEC Alert 48 hours ICAM Report and Presentation 30 days ^{#4}	N/A	HSEC Alert within 48 hours to Department and Operations Incident Investigation Reports (Detailed and Summary) 40 days ^{#4}	Glencore HSEC Incident Report Form – A & B - 24 hours Incident Investigation commences within 72 hours ^{#5} Incident Investigation Report 45 days
Category 2 or 3	Notification	Verbal (Immediate)	Verbal (Immediate)	Injury only or E&C - Verbal (as soon as possible)	E&C – Verbal (as soon as possible)	N/A	N/A	N/A
	Reporting	N/A	Complete Incident Investigation Report before end of shift Superintendent/ Coordinator facilitates a formal review with relevant stakeholders	N/A	E&C – HSEC Alert 48 hours	N/A	N/A	N/A
Category 1	Notification	Verbal (Immediate)	Injury only - Verbal (as soon as possible)	N/A	N/A	N/A	N/A	N/A
	Reporting	N/A	Complete Incident Investigation Report before end of shift	N/A	N/A	N/A	N/A	N/A

**Glencore Coal Assets Australia
Standard**

6.0 Incident

Incident Category	Action by	Person Involved	Supervisor / Supt	Operations Manager ^{#6}		General Manager / Director	GCAA	
	Recipient	Supervisor and Superintendent	Department Manager, Operations Manager and E&C / HST Manager	General Manager and Director	General Manager E&C / HST	Chief Operating Officer	GCA	Glencore (Baar) GCA responsible
<p>#1 Initial data for all incidents, actual and potential, is to be recorded in CMO within one working day. For environment or community incidents, information is to be submitted prior to end of shift.</p> <p>#2 If doubt exists in relation to an incident, legal advice and support should be sought to determine if legal privilege should be invoked.</p> <p>#3 Glencore HSEC Incident Investigation Report (pptx) is required only for significant HPRI as determined by the Department or Glencore Corporate HSEC.</p> <p>#4 Where additional time is required for completion of the ICAM Incident Investigation Report, approval from GM HST or E&C is required.</p> <p>#5 Incident Investigation is supported by an external person nominated by the Department and Glencore Corporate HSEC (Refer to Appendix C.7)</p> <p>#6 Operations Managers are to complete regulatory/statutory reporting requirements for their operating jurisdiction.</p> <p>#7 A Category 4 or 5 potential incident could be indicated where evasive action was taken to avoid an incident.</p>								

Appendix C - Statutory Notification and Reporting

C.1 Queensland Coal Mining Safety and Health Act 1999

Incident Category	Action by		Site Senior Executive
	Recipient	Dept. of Mines and Energy Inspector	Industry Safety and Health Representative (ISHR)
Serious Accident/ High Potential Incident/ Occupational Disease	Notification	<p>The site senior executive is to, as soon as possible after becoming aware of the accident, incident or death, by notice or orally, notify an inspector and an industry safety and health representative with the following primary information;</p> <p>The precise location of the accident, incident or death.</p> <p>When the accident, incident or death occurred,</p> <p>The number of persons involved,</p> <p>The name(s) of the person involved,</p> <p>The name/s of any witnesses (if none, the name/s of the person who found the incident), and,</p> <p>A brief description of the incident.</p>	<p>Immediate notification - oral or written with the following primary information;</p> <p>The precise location of the incident,</p> <p>When the incident occurred,</p> <p>The number of persons involved,</p> <p>The name/s of the person involved,</p> <p>The name/s of any witnesses (if none, the name/s of the person who found the incident), and,</p> <p>A brief description of the incident.</p>
	Reporting	<p>Within 48 hours send written notice of the primary information (fatalities 24 hours)</p>	<p>Within 48 hours send written notice of the primary information (fatalities 24 hours)</p>
All Injuries requiring first aid or more advanced medical treatment	Notification	N/A	N/A
	Reporting	<p>Incident is recorded in the DME Monthly Incident Summary Form</p>	N/A
#1 – Reference QLD CMSHA99 S198			

C.2 New South Wales Work Health and Safety (Mines and Petroleum Sites) Act 2013

Incident Category	Action by		Site Senior Executive
	Recipient	Planning and Environment Department	Industry Safety and Health Representative (ISHR)
<p>Notifiable incidents including:</p> <ul style="list-style-type: none"> - the death of a person - a serious injury or illness - a dangerous incident, <p>and other certain incidents that:</p> <ul style="list-style-type: none"> - result in injury or illness that requires medical treatment - are classified as a high potential incident 	Notification ^{#1} and Reporting	<p>Notifiable Incidents:</p> <p>The operator is to notify the regulator immediately after becoming aware that a notifiable incident at the mine has occurred.</p> <p>Notice must be given in accordance with the relevant legislation and by the fastest possible means.</p> <p>Notice must be given by telephone or in writing (email, facsimile, or other means). Telephone notice must provide written notice within 48 hours of giving notice by telephone.</p> <p>Written notice must be in a format approved by the regulator.</p> <p>Other Incidents</p> <p>The operator is to notify the regulator as soon as reasonably practicable after becoming aware of an incident, but no later than</p> <ul style="list-style-type: none"> - 7 days after becoming aware of the incident, or - 48 hours after becoming aware that the incident resulted in an illness or injury. <p>The notification must be in writing and in a format required by the regulator.</p> <p>In the case of an incident that results in an illness or injury, the notification must include specified details.</p>	<p>Notice is to be given of an incident at the Operation (notifiable or other) in the same manner and form as notice is given to the regulator.</p>
All Injuries requiring first aid or more advanced medical treatment	Notification	N/A	N/A
	Reporting	As soon as practicable (not later than 7 days).	N/A

Incident Category	Action by		Site Senior Executive	
	Recipient	Planning and Environment Department	Industry Safety and Health Representative (ISHR)	
Workplace Injury Reports	Notification	N/A		
	Reporting	Within 30 days after the end of each quarter (31 Mar, 30 Jun, 30 Sep, 31 Dec). Details to include: the total number of workplace injuries at the coal operation during the quarter, the number of those injuries that were to employees, the number of those injuries that were to contractors, the ratio of injuries to employees to injuries to contractors, the total number of hours worked by employees during the quarter, the total number of hours worked by contractors during the quarter, the starting and finishing times of each shift worked at the coal operation, any other Gazetted information.		
#1 Reference NSW WHS(MPS)A 2013 and WHS(MPS)R 2014				

C.3 Work Health and Safety (Model Laws) and Coroners Acts

Incident Category	Action by Site Senior Executive or Operations Manager		
	Recipient	Dept. of Employment and Industry Relations	Police Officer or Coroner
Notifiable incidents (Death of a person, serious injury or illness of a person or a dangerous incident)	Notification	Immediate notification after becoming aware, by telephone or in writing	Immediate Notification (Fatalities Only)
	Reporting	Within 48 hours provide written notice in the approved form	N/A
Dangerous Event / Serious Bodily Injury / Work Caused Illness / Serious Electrical Incident / Dangerous Electrical Event	Notification	Immediate notification (Fatalities Only)	Immediate Notification (Fatalities Only)
	Reporting	Within 24 hours provide written notice in the approved form	N/A
Does not apply to a mine to which the Mine Health and Safety Act 2004 applies or to a coal workplace (NSW) References QLD WHSA 01 s38 NSW WHSA 11 s38 QLD Coroner’s Act 03 s8(3)(b) Violent or unnatural death NSW Coroners Act 09 s6(1)(a) Violent or unnatural death			

C.4 Environmental Protection Laws

Incident Category	Action by Recipient	Site Senior Executive or Operations Manager Environmental Protection Agency	
NSW Serious Environmental Harm / Material Environmental Harm	Notification	<p>Mining Operations in NSW will notify immediately each listed authority in accordance with Section 148 of the Protection of the Environment Operation (POEO) Act 1997 of pollution incidents where a “pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened”.</p> <p>Legislation requires that the notification is to be undertaken by:</p> <ul style="list-style-type: none"> • The person carrying out the activity; • An employee; • The occupier of the premises on which the activity occurs or; • The employer. <p>Notification should be undertaken immediately after the person becomes aware of the pollution event.</p>	
	Reporting	Immediate written notice of event, its nature and the circumstances in which it happened.	
QLD Serious Environmental Harm or Material Environmental Harm	Notification	<p>Written notice is to:</p> <ul style="list-style-type: none"> - include relevant information to satisfy the necessary requirements of the duty to notify harm and the relevant approval condition. - clearly indicate that the written notice is given in compliance with ss. 320–320G and the relevant approval condition. - be given within the earliest expiring timeframe. 	
	Reporting	Immediate written notice of event, its nature and the circumstances in which it happened.	
Environmental Protection Act 94 (QLD) ss320 Protection of the Environment Operations Act 1997 No 156 [NSW]			

C.5 NSW Mining – Protection of the Environment

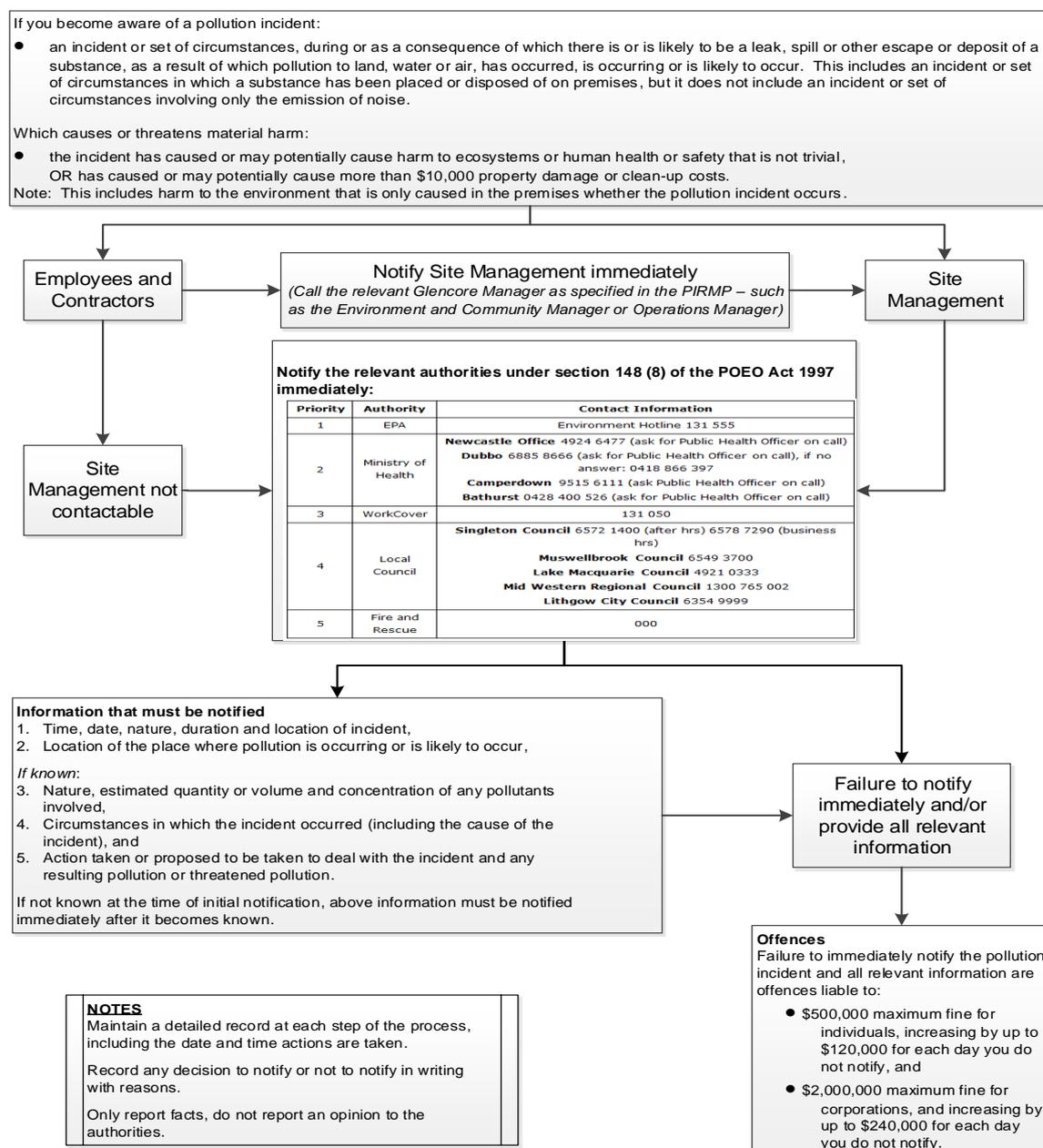
Mining Operations in NSW are to immediately notify each listed authority in accordance with Section 148 of the Protection of the Environment Operation (POEO) Act 1997 of pollution incidents where a “pollution incident occurs in the course of activity so that material harm to the environment is caused or threatened”.

Legislation requires that the notification is to be undertaken by any of the following people:

- The person carrying out the activity.
- An employee.
- The occupier of the premises on which the activity occurs.
- The employer.

Notification should be undertaken immediately after the person becomes aware of the pollution event.

The following flow chart gives guidance as to the process to follow for notification on the event of an externally reportable environmental incident.



If the information required by Section 150 (c), (d) or (e) of the POEO Act 1997 (as described above) is not known at the time of the initial notification, but becomes known afterwards, that information is to be notified in accordance with Section 148 immediately after it becomes known.

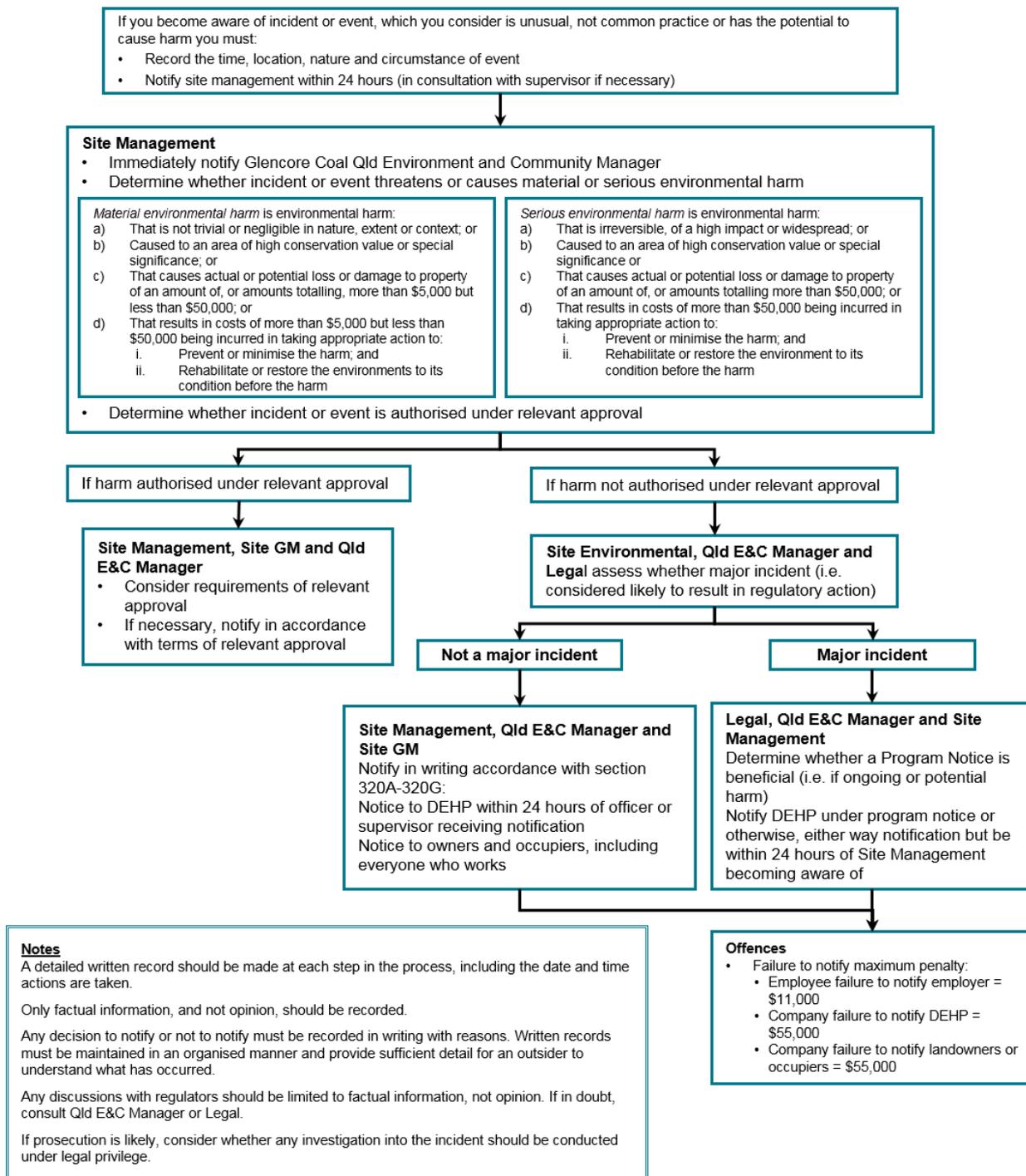
There may also be requirements for notification to other government departments as a result of incidents or non-compliance in other approvals or legislation such as Contaminated Land Management Act 1997, EPBC Approvals, Project Approvals, Mining Leases and Subsidence Management Plans.

All Operations are to familiarise themselves with the specific reporting requirements of their respective approvals and establish a process to assist with meeting these requirements.

C.6 QLD Mining - Environment and Heritage Protection

Mining Operations in QLD are to immediately notify the Department of Environment and Heritage Protection (DEHP) in accordance with the QLD Environmental Protection Act 1994, and specifically as per the requirements set out in each Operations' Environmental Authority (EA) or Development Approval (DA). Notifications are required within 24 hours for any event or incident where environmental (or serious environmental) harm is threatened or caused, and the harm is not approved by the relevant approval.

Notifications will need to follow the specific terms of the relevant approval. The following flow chart below provides guidance as to the process to follow for notification in the event of an externally reportable environmental incident.



C.7 Development Consent (NSW) or Environmental Authority (QLD) Breaches

C.7.1 NSW

In NSW, after detecting an exceedance of the limits or performance criteria in the development consent approval, the mine is to report the exceedance to the Department of Planning and Environment, and any other relevant agency. This report is to:

- a) Describe the date, time, and nature of the exceedance.
- b) Identify the cause (or likely cause) of the exceedance.
- c) Describe what action has been taken to date.
- d) Describe the proposed measures to address the exceedance.

A breach of consent conditions should be reported to the Department of Planning and Environment, regardless of whether or not the non-compliance may appear to be 'not valid.' For example, the non-compliance should still be reported even if it can be attributed to regional weather conditions or cumulative impacts rather than performance of the mine itself. The Department will determine if the non-compliance should be considered as an incident and may request a formal report.



Note

Notification timeframes are specified under site specific development consent conditions. If no timeframe is specified, the report is to be submitted within seven days. If the incident causes or has the potential to cause harm to the environment, the EPA should be notified immediately.

C.7.2 QLD

In QLD, the specific terms for reporting any breaches of Environmental Authority conditions are set out in that particular Operations' EA. These regulatory non-compliances (or potential non-compliances), has to be reported as such to the Department of Environment and Heritage Protection in the format requested.

Appendix D - Category 4 and 5 (actual) 72 hour Independent Investigation Support

D.1 Independent Support Resource

Independent Support Resources are to be nominated by Divisions / Departments HSEC and Corporate HSEC. The nominees are to be made available at the request of Corporate HSEC or another Department.

A master list of support resources names is to be kept on the HSEC website.

The independent support resource is to be fulfilled by someone outside the department that had the incident.

The independent support resource is to report to the Corporate HSEC for the duration of the investigation process.

D.2 Independent Support Role

The role of an Independent Support Resource is to:

- a) Provide objective third party investigation support in the event of a fatality (incident).
- b) Check that immediate remediation was carried out and return to work - before the identification of the incident root causes - does not endanger more lives or cause further damage.
- c) Check that the evidence and the scene of the fatality (incident) were correctly preserved to enable the investigation.
- d) Check that the requirements pertaining to the chairperson and Lead Investigator are met and the investigation team includes appropriate team members.
- e) Confirm the investigation is thorough and see that all line of enquiries and contributing factors are considered.
- f) Confirm the correct investigation process is followed and provide assistance in using problem solving tools such as: Timeline, Barrier Analysis, ICAM and Why Tree.
- g) Confirm all identified incident causes and / or factors have an appropriate corrective action and are correctly integrated in the proposed action plan.
- h) Increase the opportunity for gaining and sharing knowledge to prevent a repeat fatality (incident).

D.3 Investigation Responsibilities

These responsibilities are for Category 4 and 5 incidents only and do not override local legislative requirements.

Activity	Accountability
Visiting incident site	A senior representative of the relevant Glencore Department should aim to visit the Operation as soon as practical after the event, to gain a first-hand understanding.
Chairing the enquiry	Most senior member of the asset or site.
Leading the investigation	The Lead Investigator sees that the investigation is carried out according to Glencore HSEC requirements and that external requirements including legal / statutory requirements are satisfied. Appointed person from another asset within the department or an unrelated section of the Operation.
Signing-off on Corporate 45 day final report	Industrial Lead, Asset CEO, Chairperson, Lead Investigator and Independent Support Resource.
Reviewing the effectiveness of the investigation process	Corporate HSEC
Sharing lessons learnt	Corporate HSEC

The final report is to be completed within the 45 calendar day investigation period and sent to HSEC Corporate (incident@glencorexstrata.com) for publication in the HSEC Intranet.

The investigation outcomes are to be presented by the relevant head of Division / Department / Asset to the Board HSEC committee.