



# Program

# Emergency Management Program

EM-PROG-0002

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# 1. Introduction

## 1.1 Program Owner

Emergency Preparedness & Compliance Coordinator

## 1.2 Purpose

The Emergency Management Program provides the framework for an integrated approach to emergency management at Alliance Pipeline. It ensures a uniform understanding of emergency management across Alliance. The program describes:

- A summary of the processes and procedures designed to prepare for, respond to, and recover from emergency situations that could arise in the course of business operations
- How the program is planned, implemented, validated (through checking and corrective action) and reviewed by management
- How the program aligns and integrates with the Alliance Integrated Management System (AIMS)
- Roles and responsibilities for Emergency Management throughout Alliance

## 1.3 Scope

The Alliance Emergency Management Program is intended to prepare for an emergency, respond to and mitigate conditions during an emergency and recover from an emergency that could adversely affect the safety of the public, the workers, property, or the environment.

The Emergency Management Program identifies the family of documents that make up the whole of emergency management activities at Alliance Pipeline, from Preparedness to Response and Recovery. While these plans and programs are unique to and managed by each department, together they comprise the Emergency Management Program.

This Program applies to:

- Alliance Pipeline Limited Partnership (Alliance Pipeline Ltd. being its general partner)
- Alliance Pipeline L.P. (Alliance Pipeline Inc. being its general partner)
- NRGreen Power Limited Partnership (NRGreen Power Ltd. being its general partner)

Business Continuity Plans (BCPs) are contingency plans that enable the delivery of critical services to clients following an abnormal event that disrupts business operations. Although BCPs may need to be invoked before, during or after an emergency situation, managing these documents is not in scope of the Emergency Management Program.

The scope of the Emergency Management Program includes all Alliance's above and underground pipeline assets and facilities, as well as all Alliance office locations.

The Emergency Management Program may also comprise plans, procedures, and contingencies to deal with other non-safety emergency situations such as data loss, security breaches, and reputation damage.

## 1.4 Objectives

The overall objective of the Emergency Management Program is to anticipate, manage and mitigate conditions during an emergency with the overall goal of reducing the likelihood, frequency, and impact of adverse events on the safety of the

public, the workers, property, or the environment. Specific goals, objectives and targets for the Emergency Management Program are established each year through the Program's participation in the Alliance Integrated Management System (AIMS) Goals, Objectives and Targets Process.

## 1.5 Document Review Cycle

This Program document is controlled and is reviewed annually, not to exceed 15 months, as per the Emergency Management Program regulatory requirement.

The review process follows procedures described in the Managing Controlled Documents Procedure [BDD-PROC-0007].

At least every three years, the Emergency Management Program undergoes a comprehensive review.

## 2. Program Overview

### 2.1 Description

The Emergency Management Program is the overarching framework that provides a comprehensive and coordinated approach to emergency management activities by integrating elements identified in operational and business continuity plans from across departments at Alliance.

Research and industry best practices have proven that a proactive approach is the most effective method of emergency management. By focusing on programs of prevention (companywide hazard identification, risk assessment and controls) and mitigation (emergency management), Alliance believes the impact of an emergency on the public, stakeholders and its employees, the environment and infrastructure will be lessened. Prevention is a responsibility of all Alliance's programs.

Alliance's preparedness and response programs are centered on the goal of preservation of life safety (public, workers, and emergency responders) first, then the environment and property. These programs are inclusive of all stakeholders in the Alliance system.

Preparedness refers to actions taken prior to an emergency with the intention of increasing the efficiency and effectiveness of response and recovery efforts. At its essence, preparedness is about building resiliency and response capacity and effectiveness.

Results and observations from events, exercises and program inspections are recorded as per the Emergency Management Protection Program Audit, Inspection and Monitoring Process (BDD-BUSPROC-0003) in order to identify and drive continual improvement.

Response refers to actions taken during or immediately after an emergency for the purpose of managing the consequences. Alliance has adopted the Incident Management System to facilitate effective and efficient emergency management.

Recovery can be divided into short and long term goals. In the immediate aftermath of an event, Alliance will begin working on a return to service plan that includes an analysis to ensure the safety of the entire pipeline. Lessons learned from the emergency will be incorporated during reconstruction of the incident to strengthen the prevention, mitigation, and preparedness measures.

By means of the Assessment of Need Process (BDD-BUSPROC0043), Alliance will ensure that adequate human and non-human resources are in place to insure thorough and effective implementation of the Emergency Management Program.

### 2.2 Regulations and Industry Standards

Alliance is federally regulated and is accountable to the National Energy Board (NEB) in Canada, and the Department of Transportation (DOT), Pipeline and Hazardous Materials Safety Administration (PHMSA) in the United States. Because Alliance's pipeline transits numerous jurisdictions, the company is required by law in both Canada and the United States to develop an emergency response program and associated plans. The legislation and regulations specifically relevant to the Emergency Management Program include:

- National Energy Board, Onshore Pipeline Regulations
- 49 CFR Part 192 and 195, Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards

Many of the programs referenced in this program are also legislated; refer to the specific program document for details about applicable legislation and compliance.

This program was developed based on the requirements and guidance from the following standards:

- Section 23 of the “Alberta Industrial Wildfire Protection Act” requires that industries operating on public land in Alberta submit an annual fire control plan.
- Industry standard: Canadian Standards Association Z1600-08. (2008). Emergency management and business continuity programs. Mississauga, ON: Canadian Standards Association
- Industry standard: CAN/CSA-Z246.2 (2014). Emergency preparedness and response for petroleum and natural gas industry systems
- Industry standard: Federal Emergency Management Agency. (1993). Emergency management guide for business and industry: A step-by-step approach to emergency planning, response and recovery for companies of all sizes (FEMA-141). Retrieved from [www.fema.gov](http://www.fema.gov)
- Industry standard: Public Safety Canada. (2010). Emergency management planning guide. Retrieved from [www.publicsafety.gc.ca](http://www.publicsafety.gc.ca)
- Industry standard: National Fire Protection Association 1600. (2007). Standard on disaster/emergency management and business continuity programs. Retrieved from [www.nfpa.org](http://www.nfpa.org)
- Alliance Pipeline monitors industry leading practices with respect to emergency risk assessment by participating in industry associations like CEPA and IINGA.

## 2.3 Leadership, Structure and Responsibilities

### 2.3.1 Program Owner

The Emergency Preparedness and Compliance Coordinator is responsible for the Emergency Management Program. This person’s responsibilities are to:

- Develop, administer, and keep current the Emergency Management Program
- Ensure that adequate attention is given to all aspects of the Emergency Management Program and to the needs of all Alliance personnel involved in the Emergency Management Program
- Guide the Internal Stakeholders who might be involved in an emergency response.
- Ensure the Emergency Management Program adheres to regulatory requirements
- PLACEHOLDER – CEPA CAP – process to be incorporated here

### 2.3.2 Senior Management

The Director, Operational Compliance is the senior level authority for the implementation and maintenance of the Emergency Management Program.

Specific responsibilities include:

- Provide leadership and assume overall accountability for the program
- Consulted in the Approval of the Emergency Management Program

### 2.3.3 Internal Stakeholders

Departments that are stakeholders in emergency management include:

- Security

- Health and Safety
- Operational Compliance & Information Systems
- Pipeline Operations & Engineering
- Legal, Corporate Compliance, and Regulatory Affairs
- Health & Safety
- Environment
- Corporate Communications
- Commercial Operations
- Corridor Management
- Audit and Governance
- Daily Operations – Gas Control
- Operations Planning & Coordination
- Information Services

Specific responsibilities include:

- Manage all specific programs, plans, and processes in compliance with Alliance standards and applicable legislation, regulatory requirements, and industry standards
- Communicate changes to specific programs if these changes will significantly impact emergency management activities at Alliance,
- Provide input to or assist in coordinating the preparation, implementation, evaluation, maintenance, revision, and improvement of the Emergency Management Program
- Identify and engage with additional stakeholders. Specifically Emergency Officials for the purposes of liaison activities.
- Undertake a comprehensive review of the program to evaluate effectiveness and identify gaps every three years

### 3. Program Details

The Emergency Management Program is planned, delivered, monitored and evaluated in accordance with the 17 elements of the Alliance Integrated Management System. The following table describes the Emergency Management Program’s alignment with AIMS Processes, along with additional Program Process and Practices used to support the AIMS Elements at the Program level.

AIMS Framework BDD-MGMT-0006		Program Alignment and Implementation	
AIMS Element No.	AIMS Element	Uses AIMS Processes Identified in AIMS Framework	Additional Documents to Support Program Implementation
N/A	AIMS Framework BDD-MGMT-0006	N/A	Emergency Management Program [EM-PROG-0002]

AIMS Framework BDD-MGMT-0006		Program Alignment and Implementation	
AIMS Element No.	AIMS Element	Uses AIMS Processes Identified in AIMS Framework	Additional Documents to Support Program Implementation
1	Leadership Accountability	Yes	Reference AIMS documents
2	Policies and Commitment Statements	Yes	H&S Policy [BDD-PLCY-0035]
3	Hazard Identification and Risk Assessment	Yes	<p>AIMS Hazard Identification and Risk Assessment [BDD-BUSPROC-0039]</p> <p>Emergency Management Program Hazard Identification, Risk Assessment and Control Process [EM-BUSPROC-0001]</p> <p>Health and Safety Hierarchy of Control Category Assessment Practice [HSE-PRAC-0191]</p>
4	Goals, Objectives and Targets	Yes	Reference AIMS documents
5	Legal Requirements	Yes	Reference AIMS Documents
6	Organizational Structure, Management System Roles and Responsibilities	Yes	<p><b>Preparation phase</b></p> <p>See Roles &amp; Responsibilities in:</p> <p>Emergency Response Liaison Practice [COR-PRCS-1007]</p> <p>EM Practice Exercises [EM-PRAC-0002]</p> <p>Corridor Public Awareness [COR-PRCS-1001]</p> <p>Assessment of Need Process [BDD-BUSPROC-0043]</p> <p><b>Response phase</b></p> <p>See R&amp;R's in Emergency Response Plan [EM-PLAN-0012]</p> <p>Note: Emergency Response EST and IMT roles and responsibilities are assigned to internal employee-partners</p>



AIMS Framework BDD-MGMT-0006		Program Alignment and Implementation	
AIMS Element No.	AIMS Element	Uses AIMS Processes Identified in AIMS Framework	Additional Documents to Support Program Implementation
			only. <b>Recovery phase</b> See Appendix A – Recovery phase Roles and Responsibilities
7	Operational Control – Normal Operating Conditions	N/A	N/A
8	Operational Control – Upset or Abnormal Operating Conditions	Yes	See Emergency Response Plan [EM-PLAN-0012]
9	Management of Change	Yes	Reference AIMS Documents
10	Training Competency and Evaluation	Yes	Emergency Management Exercises Practice [EM-PRAC-0002]
11	Communication	Yes	<b>Internal Preparedness Communications</b>  Communication Process [BDD-BUSPROC-0036]  <b>Preparation phase</b>  External Communication Policy [BDD-PLCY-0070]  Stakeholder Management [COR-PROG-1003]  <b>Response and Recovery phase</b>  Crisis Communication Plan [COM-PLAN-0001]  External Stakeholder and Regulatory Reporting [EM-GUID-0007]
12	Investigating and Reporting Incidents and Near Misses	Yes	Reference AIMS Documents
13	Inspection, Measurement and Monitoring	Yes	Emergency Management Program Audit, Inspection and Monitoring

AIMS Framework BDD-MGMT-0006		Program Alignment and Implementation	
AIMS Element No.	AIMS Element	Uses AIMS Processes Identified in AIMS Framework	Additional Documents to Support Program Implementation
			Process [EM-BUSPROC-0003]
14	Audit and Assessment	Yes	Emergency Management Program Audit, Inspection and Monitoring Process EM-BUSPROC-0003
15	Documentation and Document Control	Yes	EM-BUSPROC-0003
16	Records Management	Yes	Reference AIMS Documents
17	Management Review	Yes	Reference AIMS Documents

## Appendix A – Recovery Phase Roles and Responsibilities

Recovery refers to any actions taken to restore services and facilities in the aftermath of an emergency. The Emergency Manager is responsible to put the organization in place that coordinates and the groups involved in recovery activities described below.

### **Recovery Planning**

*Parties Involved:* Information Services, Audit and Governance, Incident Management Team, and Emergency Support Team

Responsibilities include, but are not limited to, the following:

- To create redundancies and back up databases to facilitate recovery
- Coordinate activities with first responders and local governments in communities in which Alliance operates to integrate Alliance processes and plans into any existing local area plans for recovery, if available

### **Immediate Recovery**

*Parties Involved:* Business Continuity Team, Emergency Support Team, Operations, Land Right of Way and Corridor Management

Responsibilities include, but are not limited to, the following:

- Minimize business losses and facilitate a recovery of critical business processes
- Manage the process of recovering and restoring business after an incident or disaster
- Begin planning for recovery and return to service; Integrity Management – Return-to-service Planning Practice [INT-PRAC-0024]
- Identify investigation team and initiate process
- Identify personnel who will be involved in recovery and restoration (this may be managed as a project or through the continued use of the Incident Command System)
- Carry out construction and repair activities under the direction of the Project Manager, or the Construction/Repair Support Unit Leader if the Incident Command System is still activated, and return system to normal operations
- Provide services to impacted stakeholders and return them to normal as quickly as possible

### **Post-Incident Recovery and Operation Planning**

*Parties Involved:* Project Team/Emergency Support Team, Operations, Health & Safety, Environment, Pipeline and Corridor Risk Management, Engineering and Projects, Information Services, Corporate Communications, as well as members from several departments

Responsibilities include, but are not limited to, the following:

- Plan and coordinate reconstruction efforts for the transmission pipeline system in accordance with industry regulations, standards, and Alliance practices
- Plan and coordinate reconstruction efforts for damaged facilities in accordance with industry regulations, standards, and Alliance practices
- Carry out construction and repair activities

- Ensure that project follows all regulatory and Alliance health and safety standards
- Assess and monitor the impact of the recovery on the environment, ensuring all environmental processes are followed
- Participate in the incident investigation and apply lessons learned from investigation into root cause and contributing factors
- Incorporate prevention/mitigation strategies
- Incorporate prevention/mitigation strategies into reconstruction
- Restore functionality of network system and recover data
- Repair, if necessary, any telecommunication hardware
- Facilitate communication between stakeholders affected by the emergency and reconstruction activities and Alliance
- Work with the stakeholders to ensure that their needs and the needs of the company are met during recovery
- If necessary, rebuild relationships and enhance public awareness activities
- Continue to manage corporate communications so Alliance remains a credible information source
- Strive to reduce media and public speculation and reporting inaccuracies, and ensure message and information dissemination consistency
- Prepare information releases to the news media, employee-partners, the Senior Leadership Team and the Board
- Guide the strategic communications for managing any public issues created by the emergency to help protect corporate reputation

## Revision History

Revision	Date	Summary of Changes	Checked by
00	2016-03-10	Initial Draft, with input from Emergency Management Program BDD-PROG-0004, Rev 01, 2014-11-05 and clean up alignment with other program documents including layout	[REDACTED]
01	2018-06-11	CEPA Corrective Action Plan revisions to reach a 3/implemented state by 2020	[REDACTED]
[03]	[YYYY-MM-DD]		