



ENGINEERS
AUSTRALIA

Principal Secretariat Officer

Review of Victoria's electricity and gas network safety framework
8 Nicholson Street
East Melbourne Victoria 3002

Submitted by email to: delwp.secretariat@delwp.vic.gov.au

27 June 2017

To whom it may concern,

Re: Review of Victoria's Electricity and Gas Network Safety Framework

Engineers Australia would like to thank the Victorian Government for the opportunity to make a submission on the "*Review of Victoria's Electricity and Gas Safety Framework*".

The Institution of Engineers Australia (Engineers Australia) is the not-for-profit professional association for engineers. Established in 1919, Engineers Australia is constituted by Royal Charter to advance the science and practice of engineering for the benefit of the community.

Engineers Australia is the trusted voice of the profession. We are the global home for engineering professionals renowned as leaders in shaping a sustainable world.

Engineers Australia believes that the safety framework for the gas network must fully consider condition, location and quality of product and its effect on pipelines in place or under consideration. The obligations that require Environment Plans, Safety Management Plans, Part Decommissioning Plans and Decommissioning Plans are important to ensure protection of the community. The Regulator should be explicit in the minimum expectations required in these documents to ensure consistency.

To assist in the facilitation of a safety culture workforce, a form of ongoing regulatory assessment/audit should to be considered to ensure these documents are functional and integral to the culture of the licensees/operators of these pipelines. In the assessment/audit, regulators should consider if the corporate safety framework is a primary organisational focus, communicated routinely, tracked, recognised and rewarded throughout all levels of the organisation. Are there specific safety metrics illustrating that: a) each employee is responsible and accountable for safety performance, and b) clear safety policy, process and procedures are communicated throughout the organisation through training, tailgate sessions, and field coaching, with no opt-out. Third-party contractors utilised by the corporations must be held to the same processes, metrics, and standards.

Lack of timely regulatory response has sizable detriment to business commercial positions. In Safety Regulations, we suggest that the Safety Framework being proposed, beyond considering licensees operating improvements, consider a specific statutory obligation for the Regulatory response to industry interactions.

The obligations of other regulatory authorities have been defined in various guidelines including the regulatory commitment to respond to applicants within specified timeframes. This commitment by the Regulator would ensure companies have a clear understanding of the commerciality of projects, without the need to make assumptions.

Engineers Australia believes that for our members and the organisations in which they work, a strong safety culture should always focus on “zeros” with an objective of no injuries or accidents. It’s good for employees, it makes economic sense, and it’s the right thing to do.

Should you have any questions in regards to this submission or wish to discuss this submission in more detail please do not hesitate to contact me.

Yours sincerely

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