PURPOSE

The purpose of the Canada Gas Emergency Management Program Manual (EMPM) is to establish TC Energy's governance and framework for emergency management within Canada Gas. This manual aligns with TC Energy's Operational Management System (TOMS), *TOMS Emergency, Business Continuity, and Security Management (E11) Element Standard (CAN-US-MEX)* (Item ID CD90000704). The Emergency Management Standard defines the requirements necessary to protect people, the environment, and property, the EMPM describes how those requirements are implemented.

While the Standard encompasses all three disciplines (Emergency Management, Business Continuity and Security Management), each is supported by a distinct Program. Accordingly, this Program Manual addresses only Emergency Management, with separate manuals available for Business Continuity, Business Continuity Planning Procedure, and Security Management. The security of TC Energy's pipeline systems and facilities is managed under the *Corporate Security Program Manual (CAN-US-MEX)* (Item ID 014155455). This program addresses threats such as theft, sabotage, terrorism, labour disruptions, and protests that could impact the integrity or operation of Canada Gas assets.

Cyber threats to pipeline control systems are managed separately under TC Energy's Cybersecurity Policy and supporting standards.

SCOPE

The Emergency Management Program Manual (EMPM) applies to all assets, employees, and contractors within Canada Gas, regardless of whether the assets are regulated. This includes assets that are wholly owned and operated by TC Energy, as well as partially owned entities and/or joint ventures where TC Energy maintains operational control.

The pipeline systems within scope are:

- Foothills System (FPL)
- NOVA Gas Transmission Ltd. (NGTL)
- TransCanada Mainline (TCPL)
- Trans Québec & Maritimes Pipeline (TQM)
- Great Lakes Canada (GLC)
- TC Ventures
- Coastal GasLink (CGL)

EXCEPTIONS/VARIANCE

Deviations from the management system elements follow a structured approach of identifying risk, assessing risk, documenting and approving deviation decisions, and monitoring the results of those decisions. The deviation process is described in the *TOMS Deviation Discipline Process (CAN-US-MEX)* (Item ID CD90001041).

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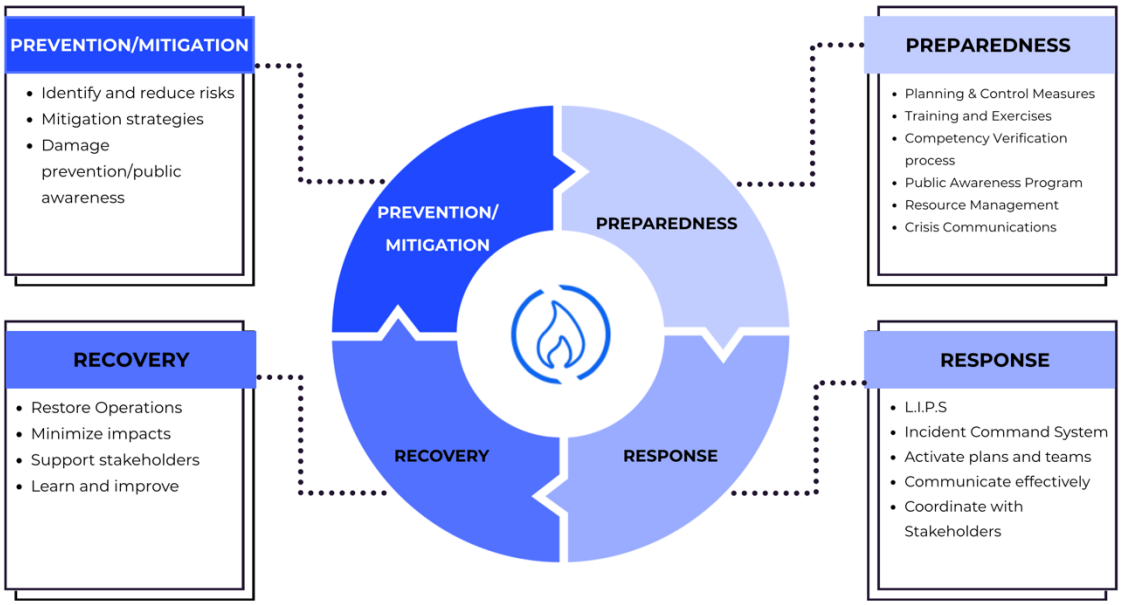
1 INTRODUCTION

At TC Energy, our goal is for our pipeline systems and energy facilities to operate safely every day so that the public, our workforce, and the environment are never impacted by an emergency involving our assets. Safety is, and always will be, our number one priority.

The Emergency Management Program Manual (EMPM) sets the foundation for how Canada Gas delivers on this commitment by establishing clear governance, accountability, and alignment with TC Energy's Operational Management System (TOMS). It provides the overarching framework that ensures prevention/mitigation, preparedness, response, and recovery activities are consistent, effective, and compliant with regulatory requirements, while supporting our core value of protecting people, the environment, and property.



2 GOVERNANCE AND MANAGEMENT SYSTEM

At TC Energy, governance and management systems work together to ensure safe, reliable, and compliant operations across all business lines. Enterprise governance establishes the framework for accountability, decision-making, and oversight, while the *TC Energy Operational Management System (TOMS) Framework (CAN-US-MEX)* (Item ID CD90000693) provides the structured approach for implementing requirements consistently throughout the organization. The Safety and TOMS Advisory Committee (STAC) serves as the key decision-making body, providing strategic direction and oversight of TOMS performance.

TOMS integrates standards, processes, and procedures into a unified, structured approach that supports the systematic identification, assessment, and control of risk across all TC Energy operations, including Canada Gas.

The Element 11 Standard for Emergency Management defines the five key requirements that Canada Gas must meet to ensure readiness, effective response, and continual improvement. These requirements are detailed in Section 3 of this Program Manual.

TOMS incorporates a defined Assurance Model, based on the Three Lines of Defence model, to verify that entities within TC are meeting the defined requirements.

They are as follows:

1. Self-Verification
2. Independent Assurance
3. Audit

The TOMS Framework embodies the principles of a management system consistent with CSA Z246.2 and the Canada Energy Regulator Onshore Pipeline Regulations (OPR). It applies the **Plan–Do–Check–Act (PDCA)** cycle to ensure that programs and processes are effectively planned, implemented, verified, and continually improved. Continuous improvement activities related to Emergency Management are further described in 3.4 of this manual.

2.1 Accountability and Authority

TC Energy is committed to advancing our culture and conducting business with disciplined practices. Our Senior Vice-President of Safety and Technical Services, President and CEO have signed a comprehensive Commitment Statement that outlines our sustainability commitments across Environment, Social, and Governance.

TC Energy's Code of Business Ethics Policy reinforces requirements and expectations for conducting business and behaviours and provides guidance to ensure our daily activities and decisions reflect, and are consistent with, our core values of Safety in Every Step.

TOMS Leadership and Accountability (E1) Element Standard (CAN-US-MEX) (Item ID CD90000701) establish the foundation for a strong safety culture and effective management system implementation. It defines the expectations for leadership commitment, accountability, and performance oversight across all levels of the organization.

This Element ensures that:

- Hazards and risks are systematically identified and mitigated.
- Assign clear responsibilities and ensure support and resources are maintained.
- Plans and procedures are developed, maintained, and implemented.
- Performance, progress, and conformance are regularly monitored and evaluated
- Leaders and workers are empowered and accountable to make safe, ethical, and environmentally responsible decisions in all circumstances.

More specifically within Canada Gas, the EMPM is signed off by VP of Operations or Delegate. This position takes full accountability of the program, plans and associated procedures and work aids.

2.2 Goals and Objectives

The following objectives define the intent and direction of the Canada Gas Emergency Management Program Manual. They reflect TC Energy's commitment to maintaining regulatory compliance and a consistent, risk-based approach to emergency management.

The objectives of the Canada Gas Emergency Management Program are to:

- **Strengthen collaboration** with external agencies, Indigenous communities, contractors, rightsholders and other stakeholders involved before, during and after an emergency.

- **Apply an integrated, risk-based, all-hazards approach** to prevention, preparedness, response, and recovery.
- **Enhance preparedness and response capability** through targeted training, exercises, and competency development.
- **Maintain accurate and current documentation, equipment, and prevention measures** aligned with operational and regulatory requirements.
- **Evaluate and incorporate lessons learned** from emergencies, exercises, and best practices to drive continual improvement.
- **Respond quickly, safely and effectively**

2.3 Roles and Responsibilities

Clear definition of roles and responsibilities ensures accountability for the implementation, maintenance, and continual improvement of the Emergency Management Program. The following roles outline who is responsible and accountable for program governance, execution, and compliance within Canada Gas.

Table 2-1: Roles and Responsiblities

Role/Department	Responsibilities
EM Specialist	**Accountable for** supporting delivery of the EM Program within assigned areas or functions. **Responsible for:** • Developing and maintaining the Program Manual, Core ERP, and supporting plans and procedures. • Planning and executing training, exercises, and After-Action Reviews (AARs). • Tracking and reporting on readiness, training completion, and exercise outcomes. • Providing subject-matter expertise during activations, audits, and program reviews. • Monitoring alignment with ICS principles and internal standards. • The procurement and establishment of emergency response resources.
Emergency Preparedness Teams	Field-based operations personnel assigned additional duties to support, promote, and champion Emergency Management (EM) activities for Canada Gas. **Responsibilities include:** • Acting as the primary liaison between the EM Specialist and field-based staff. • Identifying, communicating, and escalating questions, issues, or concerns related to Emergency Management activities within Canada Gas.

Role/Department	Responsibilities
Functional Plan Owners	**Accountable for** ensuring operational readiness of their personnel, systems and processes as it relates to emergency preparedness. **Responsible for:** • Developing and maintaining functional plans specific to their area and/or expertise. • Training and validating their plans through tabletop exercises. • Aligning to the Canada Gas Emergency Management program
Manager, Safety	**Accountable for** day-to-day administration of the Canada Gas EM Program, including maintaining accurate, current, and compliant EM documentation. **Responsible for:** • Facilitate effective communication and coordination between Operations, Projects, Emergency Management (EM) Specialists, and Enterprise EM. • Ensure sustainable program funding through appropriate allocation of resources. • Support the prioritization of projects, initiatives, and key deliverables. • Review and assess After Action Reviews (AARs) to identify trends, lessons learned, and improvement opportunities. • Oversee and coordinate all communications and correspondence related to regulatory inquiries.
Operations Manager / Project Designate	**Accountable for** ensuring operational readiness of personnel, equipment, and facilities within their area. **Responsible for:** • Implementing EM procedures and ensuring staff are trained and exercise participation requirements are met. • Providing leadership and coordination during initial response and IMT activation. • Incorporating lessons learned from incidents and exercises into local operations and projects.
Director, Canada Gas Safety	**Accountable for** the overall performance and continual improvement of the Canada Gas EM Program. • Ensuring the program meets regulatory, operational, and stakeholder expectations. • Ensuring sufficient resources are available to maintain and continuously improve the program. **Responsible for:** • Approving program updates, audits, and management review findings. • Coordinating cross-functional support. • Providing leadership to the Manager, Safety, and EM Specialists in implementing program elements.

Role/Department	Responsibilities
VP Safety and Governance	**Accountable for:** • Overall compliance of the Canada Gas Emergency Management Program with the applicable regulatory requirements (ie: **Onshore Pipeline Regulations (OPR), BCER, AER CSA Z246.2.23**) and **TOMS Element 11**. • Providing leadership, oversight, and resources necessary to sustain program effectiveness. • Reporting program performance and compliance to the Canada Gas Leadership Team and TC Energy Executives. **Responsible for:** • Endorsing EM program objectives, annual priorities, and performance metrics. • Ensuring integration of emergency management into broader enterprise governance and risk frameworks.
VP Operations	**Accountable for:** • This position is accountable for the implementation and application of the program, including its plans, associated procedures, and work aids. **Responsible for:** • Signing off on Emergency Management Program Manual ensuring regulatory compliance and ensuring operational resiliency for Canada Gas.

2.4 Regulatory and Legal Requirements

The Program Manual fulfills the regulatory requirements of the Canada Energy Regulator's Onshore Pipeline Regulations (OPR), BCER – Emergency Management Regulation, AER Directive 71 (December 2025) and reflects best practices outlined in CSA Z246.2.23, Emergency preparedness and response for petroleum and natural gas industry systems.

TC Energy has a clearly defined *Legal Requirements Monitoring Process (CAN-MEX)* (Item ID 009264333) that outlines the internal process for identifying and monitoring compliance with Legal Requirements that are applicable to Canada Gas.

2.5 Management Review

The EMPM aligns with the management review requirements outlined in *TOMS Management Review Discipline Process (CAN-US-MEX)* (Item ID 008958837).

Management Review ensures that results from program maturity assessments, performance measures, and assurance activities are formally reviewed by leadership to assess the overall **effectiveness, suitability, and alignment** of the Program with regulatory and company expectations.

Key activities include:

- Reviewing program performance, maturity, and assurance outcomes.
- Evaluating opportunities for continual improvement and corrective action.
- Confirming that objectives and performance indicators remain appropriate and achievable.

- Ensuring decisions, priorities, and resources are aligned to maintain program effectiveness.

Outputs from the Management Review are documented, communicated to relevant stakeholders, and integrated into program planning and governance processes to support continual improvement.

2.5.1 Key Performance Measures

The following KPIs are used across Canada Gas to measure performance, support accountability, and drive continuous improvement within the Emergency Management Program. These indicators help evaluate program effectiveness, identify trends, and inform opportunities for enhancement.

The detailed procedures for **collecting, validating, documenting, and reporting KPI data** are managed through established corporate processes and supporting systems. These operational procedures are **outside the scope of this Program Manual** but are followed consistently across Canada Gas to ensure accuracy, transparency, and alignment with regulatory and internal expectations.

Table 2-2: Performance Tracking Metrics

Program Area	Performance Measure	Description
Governance & Program Management	**Annual Program Management Review**	Completion of the annual review to evaluate program effectiveness, maturity, and compliance with the Canada Energy Regulator (OPR) requirements.
	Corrective Action Closure Rate	Percentage of audit, assurance, or self-verification actions closed within defined timelines.
Prevention & Mitigation	**Damage Prevention Incidents**	Number of third-party contact or near-miss events involving TC Energy pipelines — tracked for continuous reduction.
	Public Awareness Program Delivery	Percentage of planned stakeholder outreach (landowners, Indigenous communities, emergency officials) completed each year.
Preparedness	**Training and Exercise Completion**	Percentage of personnel with EM roles who complete required training and participate in scheduled exercises.
	Emergency Response Plan Review	Verification that all ERPs (including Functional Plans) are reviewed, updated, and approved annually.
	Validate Resources	Through audits inspection, drill and compliance reviews.
Recovery & Continuous Improvement	**After-Action Review Completion**	Completion of After-Action Reviews (AARs) following all exercises and real events, with lessons learned documented.
	Corrective Action Implementation	Percentage of AAR or investigation recommendations implemented and verified through the Corrective And Preventative Actions (CAPA).
Metrics for damage prevention and public awareness are addressed within their respective programs and are not duplicated within the Emergency Management program		

2.5.2 Reporting and Continuous Improvement

Performance results are documented in the annual Management Review record and shared with the **Canada Gas Operating Committee** and the **Safety and TOMS Advisory Committee (STAC) from an enterprise level**.

Findings and trends guide priorities for training, exercises, and program updates, ensuring the Emergency Management Program remains effective, resilient, and responsive to change.

2.6 Document Management

Effective recordkeeping supports the integrity, traceability, and regulatory compliance of the Canada Gas EMPM. TC Energy maintains emergency management records in approved enterprise systems to ensure critical documentation, training records, and post-incident learnings are securely stored, accessible, and tracked across the organization. *TOMS Document Management (E4) Element Standard (CAN-US-MEX)* (Item ID CD90000709) outlines the requirements to ensure documents are accurate and accessible.

Recordkeeping systems for Canada Gas include:

- **Learning Management System (LMS – Workday)** - Captures completion data for emergency management and response training in accordance with the Emergency Management Training Matrix and Course Standards Register. Ensures personnel competency, traceable records, and readiness for regulatory and internal audits.
- **Controlled Document System** - Serves as the central repository for controlled emergency management documents, including Emergency Response Plans (ERPs), procedures, and work aids. Supports Management of Change controls, version tracking, and TOMS alignment.
- **OpenText** - Manages and archives Emergency Management documentation, including Emergency Response Plans and Annexes for Canada Gas. The system provides version control and access management to ensure only current and approved documents are being accessed and used.
- **Enablon**- Used to document and track post-incident and exercise information. Enablon facilitates the capture of incidents, near misses, HSE observations, and exercise debriefs. Lessons learned and corrective actions are tracked to drive continuous improvement and regulatory compliance.

3 EMERGENCY MANAGEMENT FRAMEWORK

All TOMS Entities, including Canada Gas are prepared to manage emergency and are guided by the five requirements mandated in the Element 11 Standard. Essentially the five requirements are driven by the four pillars of Emergency Management:

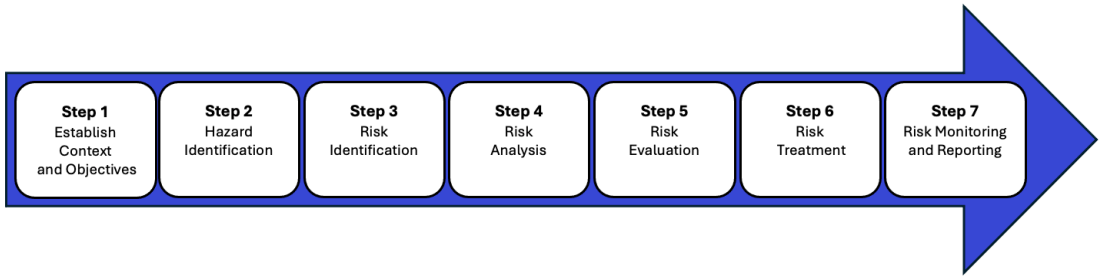
- Prevention/Mitigation
- Preparedness
- Response
- Recovery

3.1 Mitigation

Mitigation and prevention activities reduce the likelihood and impact of emergencies. Canada Gas integrates these measures into daily operations through risk management, asset integrity, damage prevention, and public awareness programs.

3.1.1 Hazard Identification & Risk Assessment (HIRA)

The Emergency Management Program Manual follows TC Energy's *Risk Management RM Standard (CAN-US-MEX)* (Item ID 008749510) to ensure hazards are systematically identified, analyzed, and managed.



Below is an overview of the Risk Management Procedure as applied to Emergency Management for Canada Gas.

1. **Establish Context** – Define scope, objectives, and criteria.
2. **Identify Hazards** – Recognize potential events or conditions that could cause an emergency.
3. **Identify Risks**- Determine which hazards could impact objectives.
4. **Analyze Risks** – Assess likelihood and consequence to understand risk level.
5. **Evaluate Risks** - Compare results to risk tolerance and prioritize treatment.
6. **Treat Risks** - Implement actions to reduce or control risk.
7. **Monitor and Report** - Track effectiveness and report results.

3.1.2 Integrity Management Program (IMP)

Canada Gas maintains a comprehensive Integrity Management Program (*Asset Integrity Program Manual (CAN-US-MEX)* (Item ID CD9000000025)) aligned with OPR, CSA Z662, and API 1173. The IMP uses system-wide risk assessments to identify and evaluate threats to pipeline safety and reliability, guiding mitigation actions such as enhanced monitoring, in-line inspections, and targeted remediation. This integrated approach ensures pipeline

hazards are proactively managed, supporting the prevention and mitigation objectives of the Emergency Management Program Manual.

3.1.3 Damage Prevention

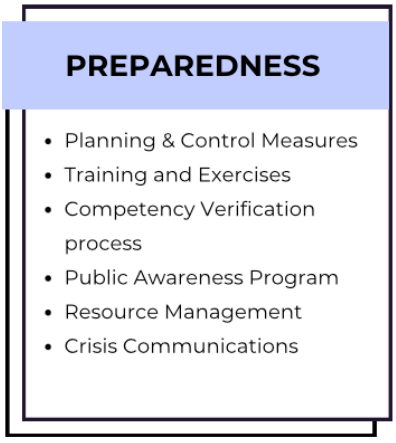
Damage Prevention is a key mitigation measure within TC Energy's Emergency Management Program Manual for Canada Gas. It focuses on preventing incidents that could result from third-party interference or ground disturbance near pipeline infrastructure. By proactively managing these risks, the company reduces the potential for product release, service disruption, and environmental impact.

TC Energy Damage Prevention Program (CAN-US-MEX) (Item ID 009830940) defines company requirements for aerial and ground patrols, signage, one-call membership, and employee training related to ground disturbance activities. It applies to all TC Energy personnel and external stakeholders engaged in work that could affect pipeline integrity.

Public Awareness is an integral component of the program, promoting education and engagement with the affected public, Indigenous communities, rights holders, contractors, emergency responders, and local officials. This outreach ensures understanding of pipeline safety, regulatory obligations, and safe excavation practices.

Through consistent engagement, compliance with regulatory requirements, and continual improvement, the Damage Prevention Program supports the overarching goals of mitigation and prevention.

3.2 Preparedness



Preparedness ensures Canada Gas can respond effectively to emergencies. It includes planning, training, exercises, and coordination with internal teams, Indigenous communities, external partners, and the public. Preparedness also encompasses crisis communications and resource management to ensure timely, coordinated, and effective response actions that protect people, the environment, and assets.

3.2.1 Planning

Effective preparedness relies on clear, consistent, and accessible documentation. Under TC Energy's Operational Management System (TOMS), Emergency Management documentation follows a defined hierarchy that ensures all preparedness activities—from planning to field response—are aligned, traceable, and compliant.

Below is the list of key emergency management documents within Canada Gas and a brief description of each.

Table 3-1: Key Emergency Management Documents

Document	Description
Element 11 – Business Continuity, Emergency Management and Security Management Standard	Defines ***what is required*** to ensure the protection of people, the environment, and property. Establishes mandatory expectations for all programs under these disciplines.
Emergency Management Program Manual (Tier 1)	Defines ***how*** the Element 11 Standard requirements are implemented across Canada Gas. Establishes governance, roles, accountability, and program controls.
Core Emergency Response Plan (Tier 2)	Outlines ***what to do*** during an emergency—ICS, procedures, checklists, notifications, and response structure.
Emergency Response Plan Supplements (Tier 3)	Details ***how and where to respond***—site-specific hazards, tactical actions, and coordination with regional agencies and Indigenous partners. Examples of supplements used within Canada Gas are “zone” and “project site-specific” plans.
Functional Plan	Functional Plans have been developed for areas of expertise or specific functions that would support either the IST or the IMT.
Work Aids/Initial Response Guides	Support responders with practical, site-level guidance for emergency execution and resource coordination.

3.2.2 Training and Exercise Program

3.2.2.1 Training

Canada Gas maintains a structured Emergency Management (EM) Training and Exercise Program to ensure that all personnel with emergency roles are qualified, trained, and capable of performing their responsibilities safely and effectively. The program contains detailed competencies required for each position within the IMT and the Company First Responders.

This program aligns with *TOMS Competency and Training (E3) Element Standard (CAN-US-MEX)* (Item ID CD90000702) and supports TC Energy’s commitment to managing health, safety, environmental, and operational integrity risks through a trained and competent workforce.

Training is progressive and role-based, building from foundational awareness to advanced, position-specific competency within the Incident Command System (ICS).

It integrates regulatory requirements (OPR, CSA Z246.2) with company expectations defined in *TOMS Emergency, Business Continuity, and Security Management (E11) Element Standard (CAN-US-MEX)* (Item ID CD90000704).

3.2.2.2 Exercises

Exercises are conducted to confirm that emergency procedures, plans, and supporting information remain current, effective, and practical. They provide personnel the opportunity to practice their roles, validate communication and coordination processes, and identify opportunities for improvement.

Canada Gas uses two main types of emergency management exercises:

- **Discussion-Based Exercises** – Used to review plans, procedures, and response strategies in a collaborative setting. **Tabletop Exercises** are the most common and are held annually for all personnel with emergency response roles. These sessions strengthen understanding of responsibilities, decision-making, and coordination.
- **Operations-Based Exercises** – Used to test functional capabilities in a simulated, real-time environment. **Full Scale and Functional Exercises** fall within this category. These may include activating an Incident Command Post or deploying personnel and resources. The frequency and scope are based on operational risk and regulatory requirements and are outlined in the Canada Gas EM Training and Exercise Program.

3.2.3 Public Awareness Program

TC Energy engages Indigenous rightsholders and landowners early in the emergency management planning process to incorporate local knowledge and strengthen preparedness.

Engagement is supported through the **Public Awareness Program**, led by TC Energy's Land Leadership and Support Canada group. The program promotes understanding of TC Energy's operations, safety, and emergency procedures among landowners, residents, Indigenous groups, communities, and emergency officials.

Outreach is provided through letters, fact sheets, signage, and community meetings, with messaging that explains the nature and timing of work, potential risks, safety protocols, and contact information. These efforts build trust, promote safe coexistence, and enhance emergency readiness.

Key activities include:

- Identifying potentially affected Indigenous groups, rightsholders and landowners.
- Sharing emergency management information and contact protocols.
- Incorporating input on local hazards, access routes, and sensitive areas.
- Encouraging participation in training and exercises.
- Sharing emergency management information and protocols on external website; available in both French and English languages.

3.2.4 Resource Management

Effective emergency response requires timely access to personnel, equipment, and materials. Each Line of Business within Canada Gas is responsible for ensuring adequate and compliant response resources are available and can be mobilized in a timely manner as defined in the definition section of this manual. This may include strategically locating staff and equipment, maintaining on-call arrangements, and establishing contracts or mutual aid agreements to close resource gaps. Specific resources and how to activate them are included in the Core ERP and associated supplements.

Canada Gas meets its response resource needs through a combination of the following:

1. **Employees** – Employees are the organization's most critical resource, underpinning the effectiveness of Emergency Management, Safety, and all

supporting programs. The organization is committed to ensuring personnel are adequately trained, supported, and resourced to fulfill their roles during routine operations and emergency response.

2. **Contract Resources** – Maintaining agreements with pre-qualified contractors, equipment rental companies, and environmental service providers to ensure timely and capable support. During an emergency, unapproved resources may be procured if approved contractors are unavailable.
3. **Company-Owned Resources** – Maintaining strategically staged response trailers, warehouses, and Flyaway Kits equipped for Incident Management Team support.
4. **Industry Cooperatives** – One of the Company's major Mutual Aid Agreements applicable to Canadian Gas Pipelines is the **CA Industry Working Group's Mutual Emergency Assistance Agreement**. The Mutual Emergency Assistance Agreement provides a mechanism for the CA Industry Working Group Members to request Emergency Assistance from one another in the event of an Emergency using the Assistance Request Form. More information of the Mutual Assistance program can be found on the Company's Emergency Management website
5. **Public Resources** – Engaging with public agencies (municipal, provincial, or federal) when available and mutually agreed upon. These agencies retain their own mandates but may voluntarily support TC Energy's response on a cost-recovery basis.

Emergency response equipment is kept in a state of readiness through regularly assigned PMs – Preventive Maintenances within the Work Management Program. Details regarding specific resources are available in both the Core Emergency Response Plan and the area and project Supplements.

3.2.5 Crisis Communications

Effective communication is critical to maintaining public confidence, supporting coordinated response, and ensuring accurate, timely information during an emergency. Crisis Communication teams are involved in both preparedness and response.

Canada Gas follows TC Energy's communication protocols which are outlined in the teams Functional Plan, to ensure consistent and coordinated messaging during emergencies. The Incident Commander is responsible for overall communication within the Incident Management Team (IMT), while the Public Information Officer (PIO) manages external communications with media and the public. The Liaison Officer (and Assistants) maintain contact with government agencies, regulatory bodies, Indigenous groups and other responding organizations and stakeholders (to align with verbiage in sections 3.6 and 3.7).

External communications—such as stakeholder notifications, regulatory briefings, and media releases—are coordinated through the External Relations team in collaboration with Legal and Commercial Operations to ensure accuracy, consistency, and compliance. In some circumstance, executive leadership may also have an approval role for incident communications.

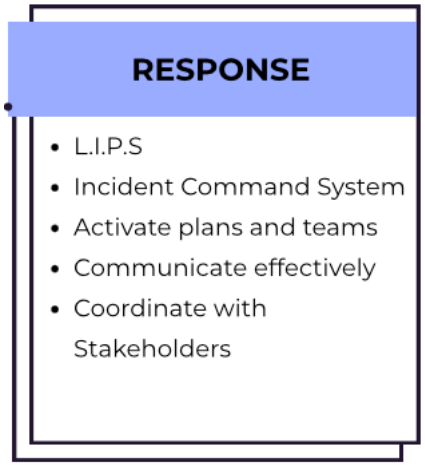
3.2.6 Media and Stakeholder Engagement

All media inquiries must be directed to TC Energy Communications / Media Relations at **403-920-7859**. Only authorized representatives—typically the Media Relations team, the Public Information Officer (PIO), or a designated spokesperson—may engage with the media or issue public statements.

Company First Responders (CFRs) receive media awareness training, including guidance to direct all media to the Media Relations team. This direction is reinforced in their CFR Checklist and Incident Management Handbooks.

When required, TC Energy coordinates joint media releases and stakeholder updates with regulators and other response partners to ensure accurate, consistent, and timely messaging.

3.3 Response



The Response phase outlines actions to manage and stabilize emergencies once they occur. It emphasizes timely activation and implementation of the Incident Command System (ICS). TC Energy has a robust response organization consisting of both field and head office personnel and is designed to be flexible and scalable.

3.3.1 Incident Command System

The Incident Command System (ICS) is a standardized, scalable structure used to manage emergency incidents and planned events. Derived from ICS Canada, it provides a common framework that enables effective coordination among TC Energy, contractors, government agencies, and Indigenous partners. ICS is based on clear roles, standardized terminology, and management by objectives, ensuring that all responders work under a unified command structure with defined responsibilities.

ICS supports TC Energy's all-hazards approach by enabling:

- **Efficient resource management** through defined roles and reporting relationships.
- **Unified Command** with partner agencies when multiple jurisdictions are involved.
- **Flexibility** to expand or contract based on incident complexity.
- **Consistent documentation** and communication across all response levels.

3.3.2 Quebec Emergency Coordination Model

Emergency management in Quebec operates under a distinct provincial framework known as the Emergency Site Management (ESM) system, which differs from the Incident Command System (ICS) used in other jurisdictions. TC Energy's Emergency Site Management (ESM)

framework is designed to align with Québec's *Cadre de référence – Intervention pipelines (CRIP)*. The ESM framework establishes defined roles, responsibilities, and site-level response processes that support coordination with municipal, provincial, and federal authorities during pipeline emergency events.

This alignment facilitates integrated incident management, effective information sharing, and compliance with applicable public safety, environmental protection, and regulatory requirements.

3.3.3 Detection, Activation and Response Procedures

This section outlines the process by which TC Energy detects, activates, and responds to emergencies affecting Canada Gas. It describes how potential emergencies are identified, verified, and managed to ensure a timely, coordinated, and effective response.

3.3.3.1 Detection of an Emergency

An emergency impacting a TC Energy asset may be detected through a variety of means. Early detection is critical to minimizing impacts and ensuring a timely, coordinated response.

Internal Detection:

Emergencies may be identified by personnel observing abnormal conditions or events. Assets are continuously monitored by control centres, operations staff, and aerial patrols. These groups are responsible for recognizing and reporting potential emergencies. If there is any uncertainty regarding asset integrity, TC Energy policy requires that operations be safely shut down. A shutdown triggers either the Incident Management or Emergency Management process, depending on the nature and severity of the event.

External Detection:

TC Energy may also be alerted to an emergency by third parties such as the public, contractors, or local authorities. These stakeholders are educated through the Public Awareness and Damage Prevention Programs to report suspected emergencies via the TC Energy Emergency Line. External notifications are treated as credible until verified.

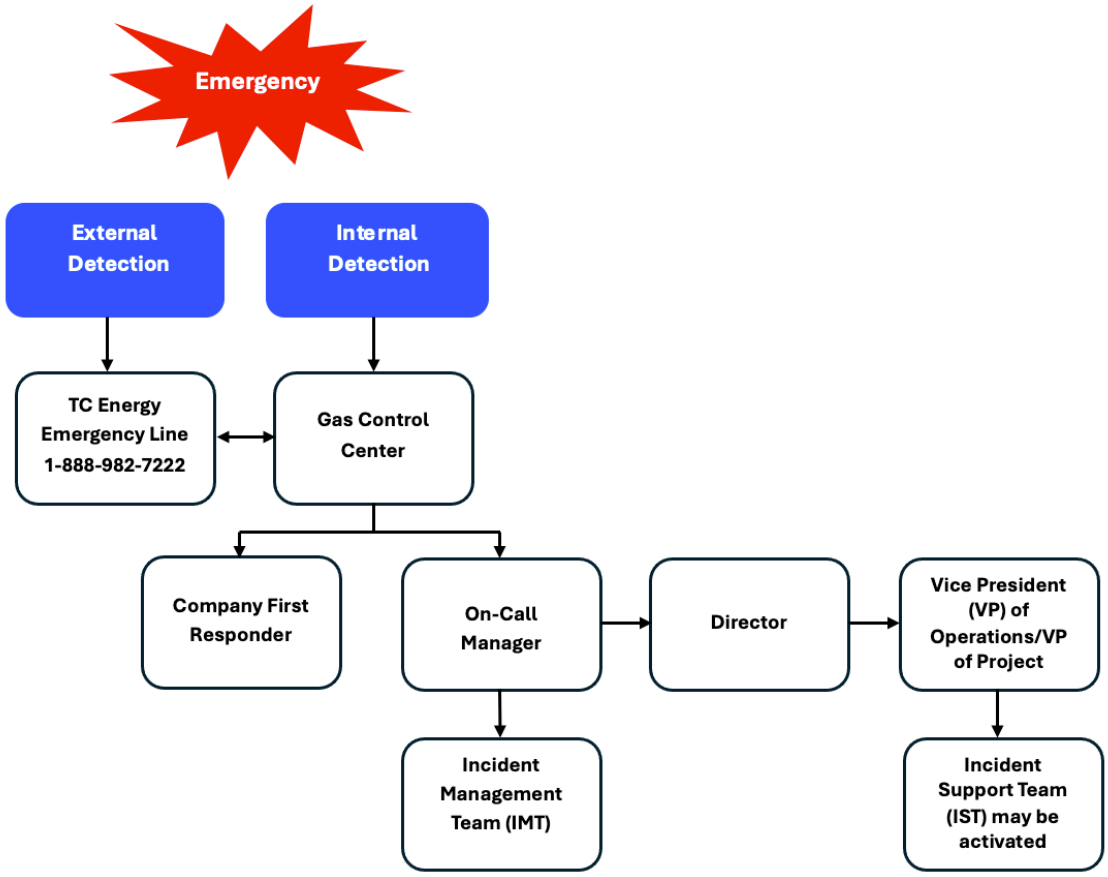
3.3.3.2 Activation of the Emergency Response Process

The emergency response process is activated when an emergency is verified through the Asset Emergency Matrix outlined in the Core Emergency Response Plan.

The **Emergency Activation Flow Chart** below illustrates the sequence of actions from detection through full program activation.

3.3.4 Overall Response Organization

Figure 1:1: Overall Response Organization



TC Energy's emergency response structure is designed to be scalable, flexible, and coordinated across all levels of the organization. The following table summarizes the response levels, their purpose, and key responsibilities — from initial field actions through to executive oversight and crisis management.

Table 3-2: Overall Response Organization

Response Level	Responsibilities
Company First Responder	The **Company First Responder** is the first Company representative to arrive at an incident site. The First Responder is responsible to: 1. Take immediate action to protect life, then the environment and property. 2. Establish communication with local emergency services. Local emergency officials shall be notified whenever an incident poses, or may pose, a threat to public safety. 3. Maintain ongoing contact with the On-Call Manager or Incident Commander.

Response Level	Responsibilities
On Call Manager	The **On-Call Manager** is responsible to: • Ensure the safety of company first responders and all other personnel. • the on-call manager will assess the situation and **escalate to senior management** • **Activate additional resources** when required beyond those available to the company first responder.
Incident Management Team (IMT)	The **Incident Management Team (IMT)** is the group of personnel organized under the I**ncident Command System (ICS)** to manage all aspects of an emergency from an Incident Command Post or virtual setting. Led by an **Incident Commander**, the IMT directs and coordinates response activities using management-by-objectives and standard ICS principles. In a **Unified Command**, a single composite IMT manages the incident. **The IMT is responsible to:** • Ensure the safety of responders and the public. • Continuously assess incident status and evolving conditions. • Define issues and establish priorities. • Set response objectives, strategies, and tactics. • Identify and request required resources. • Develop and implement the **Incident Action Plan (IAP)**. • Responsible for communicating and coordinating with regulatory agencies.
Incident Management Assistance Team (IMAT)	Specialized team trained in higher levels of ICS and utilized to support the IMT in both exercises and actual events.
Incident Support Team (IST)	The Incident Support Team (IST) may be activated to support either an Operations or a Business Continuity event and provides strategic and functional support to the IMT. **The IST is responsible to support with:** • Coordinate enterprise resources, and integrating functional groups such as External Relations, Human Resources, Legal, and others as required. The IST is led by the Vice President of the impacted Business Line.
Crisis Management Team (CMT)	This team is made up of the Executive Leadership. The team provides support for the strategic, consequence management aspects of a major event. The CMT is also responsible to keep the Board of Directors informed as required.

3.3.5 Emergency Classification

Following the initial assessment, TC Energy will assign an Emergency Classification using the Asset Emergency Classification Matrix found in the Canada Gas CORE ERP. During the Response and Consequence Management phases, the classification may be reviewed and adjusted as conditions change.

3.3.6 Response Priorities

Activities are guided by the following priorities (L.I.P.S.):

1. **Life Safety** – Protecting the public, responders, and employees.
2. **Incident Stabilization** – Containing, controlling, and minimizing escalation of the incident.
3. **Preservation of Property and Environment** – Reducing impacts to company assets, the environment, and surrounding communities.
4. **Stakeholder Communication** – Coordinating timely and accurate information with regulators, Indigenous communities, media, and other stakeholders.

3.3.7 Coordinate with Stakeholders and Rightsholders

During an emergency, TC Energy ensures open, timely, and respectful communication with Indigenous rightsholders, and other stakeholders, such as landowners, potentially affected by an incident.

Response activities include:

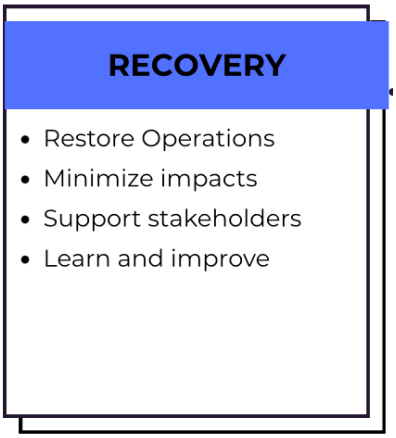
- Providing prompt notification of incidents that may affect their lands, rights, or interests.
- Coordinating with Indigenous governments, local authorities, and landowners through. This may happen via on-call Indigenous Relations support or through a Liaison Officer if one is assigned, or Unified Command structure, where appropriate.
- Sharing information to align response priorities and protect community, environmental, and cultural values.

3.3.8 Unified Command

When incidents involve multiple jurisdictions, agencies, or organizations, Canada Gas operates under a **Unified Command (UC)** structure. Unified Command allows participating entities—including TC Energy, regulatory authorities, and local responders—to jointly establish objectives, priorities, and response strategies while maintaining their respective authorities.

This structure promotes coordinated decision-making, shared situational awareness, and an effective, unified response effort aligned with enterprise governance and regulatory expectations under the **Onshore Pipeline Regulations (OPR)** and **CSA Z246.2** standards.

3.4 Recovery



The Recovery phase focuses on safely restoring operations, minimizing impacts, and supporting affected stakeholders. Activities include repairing or rebuilding infrastructure, addressing environmental and community needs, and capturing lessons learned to strengthen future preparedness. TC Energy is committed to continuous improvement—restoring operations efficiently and building back stronger.

3.4.1 Recovery Objectives

The recovery phase begins once the immediate threat to life, property, and the environment has been mitigated. The following are overall recovery objectives for Canada Gas.

- Safely restore operations and services.
- Minimize long-term impacts to people, property, and the environment.
- Support employees, stakeholders, rightsholders and affected communities.
- Identify lessons learned and corrective actions.

3.4.2 Return to Service

Return to service is managed systematically to ensure all assets are safe, stable, and compliant before resuming operations. A formal Return to Service Plan is developed and approved, outlining inspection, testing, and verification steps prior to restoring gas flow.

- All affected facilities, pipeline segments, and equipment are inspected and repaired as required.
- Job Safety Analyses (JSAs) and safety procedures are reviewed and applied during restoration.
- Rebuild or replacement decisions are based on damage assessments, operational needs, and regulatory requirements.
- Documentation of inspections, repairs, and authorizations is retained per company policy and regulatory expectations.

3.4.3 Investigation and Continuous Improvement

Incidents are evaluated to determine whether an investigation is required based on hazard, impact, and severity. When an investigation is conducted, it follows TC Energy's Controlled Document Library Database *Incident Management Standard (CAN-US-MEX)* (Item ID 1020362467) to identify root causes, corrective actions, and opportunities for improvement.

3.4.4 Stakeholder, Rightsholder and Community Support

Following an emergency, **Canada Gas** engages with affected stakeholders, indigenous groups, landowners, and communities to address concerns, communicate progress, and

coordinate restoration efforts. Transparent communication and collaboration support recovery, trust, and long-term community resilience.

3.4.5 Contingency Planning for Abnormal Conditions

Identification and evaluation of abnormal conditions are conducted in accordance with the Business Continuity Plans withing Canada Gas Operations. This process guides personnel to assess abnormal or unexpected situations and determine if and how a contingency plan should be developed and implemented.

Contingency planning complements hazard identification by identifying, evaluating, and developing alternate or supplemental controls to manage or mitigate the effects of abnormal conditions that may occur during construction, operation, maintenance, abandonment, or emergency response activities.

In the event of a failure, incident, or procedural issue, TC Energy's established programs and processes apply, including the *Nonconformance and Opportunity for Improvement Procedure (CDN-US-MEX)* (Item ID 006261835). These documents define responsibilities and authority for:

- Taking immediate action to mitigate consequences.
- Investigating failures, incidents, and non-conformances to determine root causes.
- Evaluating the need for preventive measures to avoid recurrence.
- Communicating investigation results and corrective or preventive actions to relevant stakeholders and rightsholders.

Contingency planning ensures TC Energy maintains flexibility to address unexpected conditions, adapt response strategies, and sustain operational resilience across Canada Gas assets.

4 PROGRAM SUSTAINMENT

4.1 Management of Change

The Emergency Management Program Manual aligns with *TOMS Management of Change (E5) Element Standard (CAN-US-MEX)* (Item ID CD90000703) as outlined in TC Energy's Operational Management System (TOMS).

The MOC process ensures that any changes impacting the Emergency Management Program Manual are identified, evaluated, approved, and communicated in a controlled and consistent manner. It provides a structured approach to document proposed changes, assess associated risks, determine impacts, and obtain appropriate approvals. Once approved or rejected, the rationale and requirements are communicated to affected stakeholders to ensure understanding and compliance.

Examples of changes managed through this process include updates to regulatory requirements, organizational structures, emergency response procedures, or supporting documentation.

This systematic approach supports regulatory compliance, operational integrity, and continuous improvement across all aspects of the Emergency Management Program Manual.

4.2 Continuous Improvement

TC Energy is committed to continuous improvement within its Emergency Management Program to enhance readiness, response capability, and resilience across Canada Gas. Continuous improvement activities ensures that lessons learned from exercises, incidents, and evaluations are systematically captured, analyzed, and incorporated into plans, procedures, and training.

Opportunities for improvement are identified through:

- **Incident investigations** – analyzing root causes, contributing factors, and corrective actions following an event.
- **Tabletop, Functional and Full-Scale Exercises** – evaluating coordination, communication, and resource management through realistic scenarios.
- **After-action reviews (AARs)** – debriefing participants following actual incidents or exercises to capture insights and performance observations.
- **Annual Management Review -** reviews program performance, maturity, and assurance outcomes to confirm regulatory and company alignment, validate objectives and performance indicators, and identify corrective actions and continual improvement opportunities.

4.2.1 After-Action Review Process

An After-Action Review (AAR) is a structured evaluation process used to assess TC Energy's performance during emergency events and exercises. The review focuses on what happened, why it happened, and how future performance can be improved. The process emphasizes system and procedural evaluation rather than individual fault, fostering a learning environment that strengthens TC Energy's emergency management capability.

The objectives of the AAR are to:

- Analyze the effectiveness of procedures, plans, and management systems.
- Identify successes, challenges, and corrective actions to improve preparedness.
- Reinforce positive practices and eliminate deficiencies in future responses.
- Enhance emergency response documentation, training, and resource readiness.

Findings and recommendations from investigations, exercises, and AARs are documented, tracked, and incorporated into program updates, training, and future exercises. This ensures a continuous feedback loop that promotes learning, accountability, and improvement across Canada Gas operations.

5 REFERENCES

5.1 Terms and Definitions

The following table provides definitions for key terms used within this document.

Table 5-1: Terms and Definitions

Term	Definition
Functional Exercise	An operations or projects-based exercise that tests specific functions or components of the Emergency Response Plan(s); it focuses on validating procedures and coordination without full field deployment and external resources.
Full Scale Exercise	An operations-based exercise that simulates a real emergency through the full deployment of personnel, equipment, and resources. It tests the effectiveness of plans, communication, and coordination under realistic conditions to validate overall response readiness.
Preventative Maintenance (PM)	A scheduled and systematic process conducted to maintain the reliability and readiness of emergency response equipment, vehicles, and facilities. Preventive maintenance ensures assets remain in a safe, compliant, and operational state, supporting emergency response capability requirements under TOMS Element 8 – Asset Management.
Hazard Identification and Risk Analysis	A structured process used to identify potential hazards, assess their likelihood and consequences, and determine appropriate controls.
Timely Manner	Response actions are completed as soon as practicable, based on the nature, scale, and potential impacts of the emergency event. A timely response ensures resources and notifications are mobilized without unnecessary delay, considering proximity, seasonal conditions, and the safety of responders and the public.
Accountable	The individual or position with overall ownership of an activity, decision, or outcome. This person ensures the task is completed and that it meets program, regulatory, and organizational expectations.
Responsible	The individual or position assigned to perform the work or carry out the activity. Responsible parties' complete tasks as directed and report progress or outcomes to the accountable role.

5.2 External and Internal References

This document relies on a number of references to regulation, industry codes and standards, general industry guidance and internal references, as outlined in Table 5-2 Table 3-2and Table 5-3. Latest versions of all TC Energy controlled documents can be accessed from the Controlled Document Library.

Table 5-2: External References

Organization	Title
Canada Energy Regulator (CER)	Onshore Pipeline Regulations SOR/99-294
Canadian Standards Association (CSA)	CSA Z246.2.23 Emergency preparedness and response for petroleum and natural gas industry systems
British Columbia Energy Regulator (BCER)	Emergency Management Regulation (B.C. Reg. 204/2013)

Organization	Title
Quebec Civil Protection Act	Loi sur la sécurité civile (Civil Protection Act, RLRQ c. S-2.3)
Alberta Energy Regulator (AER)	Directive 71 (December 2025)

Table 5-3: Internal References

Title	Item ID
Asset Integrity Program Manual (CAN-US-MEX)	CD9000000025
Business Continuity Planning Procedure	N/A
Code of Business Ethics Policy	N/A
Commitment Statement	N/A
Contingency Planning Process (CDN-US-MEX)	1015904227
Controlled Document Library Standard (CAN-US-MEX)	013841259
Controlled Document Library Variance Procedure (CDN-US-MEX)	007728702
Corporate Security Program Manual (CAN-US-MEX)	014155455
Establish and Monitor Goals Objectives and Targets (CAN-US-MEX)	008958835
Incident Management Standard (CAN-US-MEX)	1020362467
Incident Recording Procedure (CAN-US-MEX)	1020314675
Legal Requirements Monitoring Process (CAN-MEX)	009264333
Nonconformance and Opportunity for Improvement Procedure (CDN-US-MEX)	006261835
Operational Risk Matrix – Users Guide (CAN-US-MEX)	1020421071
Physical Security and Security Systems Standard (CAN-US-MEX)	1020373672
TC Energy Damage Prevention Program (CAN-US-MEX)	009830940
TC Energy Canada Gas Damage Prevention Program (CAN)	CD90000794
TC Energy Public Awareness Program (CAN)	1016111195
TC Energy's *Risk Management RM Standard (CAN-US-MEX)*	008749510
TC Energy Operational Management System (TOMS) Framework (CAN-US-MEX)	CD90000693
TOMS Leadership and Accountability (E1) Element Standard (CAN-US-MEX)	CD90000701
TOMS Competency and Training (E3) Element Standard (CAN-US-MEX)	CD90000702
TOMS Document Management (E4) Element Standard (CAN-US-MEX)	CD90000709
TOMS Management of Change (E5) Element Standard (CAN-US-MEX)	CD90000703
TOMS Emergency, Business Continuity, and Security Management (E11) Element Standard (CAN-US-MEX)	CD90000704
TOMS Deviation Discipline Process (CAN-US-MEX)	CD90001041
TOMS Management Review Discipline Process (CAN-US-MEX)	008958837

6 DOCUMENT HISTORY

Rev.	Description	Effective Date
01	Review conducted to provide clarity on comments received following publishing and incorporate Directive 71 requirements.	2026-02-20
	Rationale Statement	**Document Contact**
	This document was revised to address: • Out of cycle comments and feedback received following initial publishing • Emergency Preparedness and Response Directive 71	Alyssa Smith
	Impact Assessment Summary	**Document Owner**
	No known impacts to operations, training, competency, safety, regulatory compliance as a result of this update.	STS Safety & Governance Canada Safety
00	New document.	2025-12-19
	Rationale Statement	**Document Contact**
	Canada Gas has developed their own Emergency Management Program.	Alyssa Smith
	Impact Assessment Summary	**Document Owner**
	N/A	STS Safety & Governance Canada Safety

7 DESCRIPTION OF CHANGE

Reviews and approvals have been captured on review and approval checklists and attached to the Controlled Document Library (CDL) Document Management of Change (DMOC) record.

Description of Change	DMOC 8129. Out of cycle review conducted to provide clarity on comments received following publishing and incorporate Directive 71 requirements.

APPENDIX A COMPLIANCE CROSSWALK – OPR/BCER/AER/CSA Z246.2:23

This crosswalk demonstrates how the Canada Gas Emergency Management Program Manual (Tier 1) meets program-level requirements of applicable regulators and standards. Detailed emergency response procedures, notifications, and site-specific requirements are intentionally addressed in Tier 2 (Core ERP) and Tier 3 (Supplements).

A-1 CER – ONSHORE PIPELINE REGULATIONS (OPR)

OPR Requirement	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Emergency Management Program established	1.0 Purpose & Scope; 2.0 Governance; 3.0 EM Framework	Defines governance, accountabilities, and program structure aligned with TOMS Element 11.	Procedural response actions are addressed in Tier 2/3.
Emergency procedures manual identified	3.2.1 Planning Framework & Document Hierarchy	Establishes Core ERP as the emergency procedures manual within the document hierarchy.	Detailed procedures reside in Tier 2.
Roles and responsibilities defined	2.2 Roles & Responsibilities	Defines leadership, IMT, functional and support role accountabilities.	Role checklists are in Tier 2/3.
Training and competency program	3.2.2 Training & Exercise Program	Establishes role-based training and competency expectations.	Training delivery and records managed outside EMPM.
Exercises and validation	3.2.2 Training & Exercise Program; 2.5 KPIs	Defines exercise types, frequency, and performance measurement.	Exercise execution occurs in Tier 2/3.
Continuous improvement and review	4.2 Continuous Improvement; 2.5 Management Review	Establishes AARs, corrective actions, and management review cycle.	Corrective actions implemented operationally.
Document control and records	2.6 Document Management	Defines controlled document and record management expectations.	Document control and records

A-2 BCER – EMERGENCY MANAGEMENT REGULATION

BCER Program Requirement	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Emergency management governance	2.0 Governance & Management System	Defines program governance, leadership accountability, and management system integration.	Site-specific and operational governance details are addressed in Tier 2/3.

BCER Program Requirement	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Requirement to prepare response contingency plans	3.2.1 Planning Framework & Document Hierarchy	Establishes the emergency planning framework and document hierarchy, including the Core ERP and site- or project-specific supplements.	Detailed response procedures and tactical actions are addressed in Tier 2/3.
Hazard-based planning approach	3.1.1 Hazard Identification & Risk Assessment	Defines a structured, risk-based, all-hazards approach using TC Energy's Risk Management Standard to identify, assess, and prioritize emergency hazards.	Hazard-specific scenarios and controls are addressed in Tier 2/3.
Coordination with external agencies and authorities	3.2 Preparedness; 3.3 Response	Requires coordination with Indigenous rightsholders, municipalities, emergency responders, and regulators during preparedness and response through Unified Command, Liaison Officer roles, and public awareness activities.	Agency-specific protocols and contact details are addressed in Tier 2/3.
Training and exercise governance	3.2.2 Training & Exercise Program	Establishes role-based training, competency expectations, and alignment with ICS and TOMS Competency & Training standards.	Specific training and exercise requirements outlined in Training Program
Public awareness and stakeholder engagement	3.2 Preparedness – Public Awareness Program	Establishes a structured public awareness and engagement program for landowners, Indigenous groups, rightsholders, emergency officials, and the public.	Outreach materials and delivery schedules are managed outside Tier 1.
Emergency response organization and command	3.3 Response; Table 3-2 – Overall Response Organization	Defines a scalable emergency response organization using ICS - including escalation, Unified Command, and defined response roles.	Tactical response actions and checklists are addressed in Tier 2/3.
Incident communication and regulatory coordination	3.3 Response; Crisis Communications	Establishes governance for timely notification, crisis communications, and coordination with regulatory authorities and stakeholders.	Specific procedures are outlined in Teir 2 and in Functional Plans

BCER Program Requirement	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Program review and continual improvement	4.2 Continuous Improvement	Establishes governance for lessons learned and corrective actions.	Plan updates occur in Tier 2/3.
Document control	2.6 Document Management	Defines document and record control framework.	Operational records managed separately.

A-3 CSA Z246.2-23 – EMERGENCY PREPAREDNESS AND RESPONSE

CSA Program Clause	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Emergency preparedness and response program	1.0 Purpose & Scope; 3.0 EM Framework	Defines the EPR program structure and scope.	Response execution outside Tier 1.
Leadership and roles	2.2 Roles & Responsibilities	Defines leadership commitment and accountability.	Role playbooks in Tier 2/3.
Hazard identification and risk assessment	3.1.1 HIRA	Defines hazard-based planning governance.	Hazard controls elsewhere.
Resources and capability (governance)	3.2.4 Resource Management	Establishes expectations for response capability.	Resource inventories in Tier 2/3.
Training and competency	3.2.2 Training & Exercise Program	Defines competency framework.	Delivery tracked outside EMPM.
Exercises and validation	3.2.2 Training & Exercise Program	Establishes validation expectations.	Execution in Tier 2/3.
Incident investigation and learning	3.4.3 Investigations; 4.2 Continuous Improvement	Defines governance for investigations and lessons learned.	Incident actions tracked operationally.
Management review and continual improvement	2.5 Management Review	Establishes PDCA cycle and leadership review.	Plan updates implemented in Tier 2/3.
Management of change	4.1 Management of Change	Defines change control impacting emergency preparedness.	Change execution outside Tier 1.

A-4 DIRECTIVE 71 (DECEMBER 2025)

Directive 71 Requirement	EMPM Section	How Requirement is Met (Tier 1)	Tier Boundary Note
Emergency Management Program (EMP) established and maintained	1.0 Purpose & Scope; 2.0 Governance & Management System; 3.0 Emergency Management Framework	Establishes the Canada Gas Emergency Management Program at Tier 1, including governance, accountability, and a lifecycle approach (mitigation, preparedness, response, recovery) aligned with TOMS.	Operational procedures and response actions are addressed in Tier 2/3.
General program elements (incl. senior leadership sign-off, document control, records)	2.0 Governance & Management System; 2.6 Document Management	Defines governance oversight and controlled document management expectations supporting auditable program implementation and sustainment.	
Program evaluation, continual improvement, and senior management review	4.2 Continuous Improvement; 2.5 Management Review / Performance Measures	Establishes performance measures, management review, after-action review (AAR), and corrective action processes to evaluate program effectiveness and drive continual improvement.	Corrective actions are implemented and tracked; supporting evidence resides outside Tier 1.
Management of Change (MOC)	4.1 Management of Change	Establishes governance for identifying, assessing, and implementing changes impacting emergency management requirements and documentation.	Change execution (updates to ERPs/supplements, training updates) occurs in Tier 2/3.
Hazard identification and consequence analysis	3.1.1 Hazard Identification & Risk Assessment	Defines the risk-based methodology for hazard identification, consequence assessment, and prioritization to support emergency planning.	Scenario detail, any potential modelling outputs, and location-specific results are maintained in Tier 2/3.

Public and appropriate authority preparedness / engagement	3.2 Preparedness (Public Awareness / Stakeholder Engagement); 3.3 Response (Coordination)	Establishes governance for engagement with affected stakeholders and authorities as part of preparedness and response readiness.	Contact lists, notification and engagement details are in Tier 2/3.
ERP framework (corporate ERP requirement)	3.2.1 Planning Framework & Document Hierarchy; Table 31 Key EM Documents	Establishes the emergency planning hierarchy and identifies the Core ERP within the program document structure.	Detailed ERP procedures, call-outs, and field tactics are addressed in Tier 2.
Operation-specific ERP where/if required	3.2.1 Planning Framework & Document Hierarchy	Tier 1 establishes the requirement and structure for hazard/operation-specific supplements where applicable.	Operation-specific ERP content, are Tier 3.
Competency and training program	3.2.2 Training & Exercise Program	Defines role-based competency and training expectations for response personnel and support roles.	Training delivery, qualification records, and course content are managed outside Tier 1.
Exercises and validation	3.2.2 Training & Exercise Program; 2.5 Performance Measures	Establishes governance for exercise types, frequency, evaluation, and validation of readiness	Exercise conduct, scenarios, and evaluation reports are managed outside of Tier 1
Incident management expectations (response governance)	3.3 Response; Table 3-2 Overall Response Organization	Defines scalable response governance and organizational structure consistent with ICS-based response.	Incident-specific response actions, logs, and operational checklists are Tier 2/3.
Communications with regulator during an incident	3.3 Response (notifications/ coordination); 2.2 Roles & Responsibilities	Establishes governance for regulatory coordination and defined accountabilities for external communications during emergencies.	Specific reporting triggers, timelines, and contact protocols are maintained in Tier 2/3.