

## Checklist - OMP requirements for transitional developments

Hydrogen and Renewable Energy Act 2023



Government of South Australia  
Department for Energy and Mining



Act/Regulation	Guidance
<input type="checkbox"/> <b>Section 66(2) - An OMP must:</b> <input type="checkbox"/> (a) Specify the authorised operations proposed to be undertaken	<p>In the case of transitioning operations, specify the operations that were approved in the development authorisation, including:</p> <ul style="list-style-type: none"><li>• detailed description of all components of the activities to be undertaken including from operation through to decommissioning including rehabilitation.</li><li>• information on the location of the relevant activity, within the licence area, using co-ordinates in the GDA 2020 datum and including maps of the showing the location of the activities and significant topographical, environmental and cultural features.</li></ul> <p>Can reference information where present in other documentation provided to meet this requirement.</p>
<input type="checkbox"/> (c) Specify how authorised operations will be managed	<p>Can refer to what is provided under the regulations to the extent that this information shows this.</p> <p>Cover management plans for the full range of activities authorised by the licence – from construction and operation (e.g. CEMP, OEMP, SRMTMP) to decommissioning and rehabilitation (e.g. decommissioning plan). All required as relevant to the specific project and its stage of the development.</p> <p>CEMP = Construction Environment Management Plan OEMP = Operational Environment Management Plan SRMTMP = Safety Reliability Maintenance Technical Management Plan as required under the <i>Electricity Act 1996</i></p>



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<input type="checkbox"/> Pursuant to section 66(2)(d), other requirements as prescribed under regulation 37(1):  <input type="checkbox"/> (a) Policies of the licensee that address the achievement of regulatory requirements and objectives	<p>Demonstrate that corporate policies align with and provide clear line of sight on how they direct achievement of relevant objectives and regulatory requirements under the Act, regulations and licence conditions.</p> <p>Relevant objectives of the Act can be taken to include:</p> <ul style="list-style-type: none"><li>• protection of the public from risks inherent in regulated activities</li><li>• consultation with people directly affected by regulated activities and the public generally (where appropriate)</li><li>• ensuring that authorised operations that have or may have adverse effects on the environment are managed so as to reduce environmental damage as far as reasonably practicable (refer to section 4(3) of the HRE Act for the definition of environment)</li><li>• eliminating, as far as reasonably practicable, the risk of significant long term environmental damage as a result of undertaking authorised operations</li><li>• ensuring that land adversely affected by authorised operations is properly rehabilitated.</li></ul> <p>Demonstrate that the policies are fit for purpose – i.e. have been endorsed and reviewed regularly by senior management.</p> <p>State how employee awareness and adoption of the policies is ensured.</p>
<input type="checkbox"/> (b) Resources that will be applied to effectively implement the plan	<p>Comment on:</p> <ul style="list-style-type: none"><li>• how appropriate resources (including time, people, competencies and funds) are allocated to compliance systems</li><li>• allocation of resources specific to activities relevant to this OMP.</li></ul>



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<p><input type="checkbox"/> (c) Recognised industry practices and procedures that will be applied in—</p> <ul style="list-style-type: none"><li>(i) undertaking authorised operations; and</li><li>(ii) achieving compliance with regulatory requirements</li></ul>	<p>List of relevant industry standards applied to design, construction, operation and maintenance of equipment, decommissioning and rehabilitation as applicable to operations.</p> <p>Provide a summary of practices and procedures utilised in authorised operations. This may include:</p> <ul style="list-style-type: none"><li>• Operation and maintenance practices and procedures to ensure that plant and processes can be operated within the established parameters/safe operating limits during normal and abnormal conditions.</li><li>• Safe working and environmental practices which bring together legislative requirements and industry good practice into a clear set of guidelines to be used when developing inspection and maintenance plans and methods for authorised operations.</li></ul> <p>Provide:</p> <ul style="list-style-type: none"><li>• A summary of management system framework (diagram of document hierarchy is useful) outlining how the licensee's policies/plans/procedures etc. work together to achieve regulatory compliance.</li><li>• Reference documented practices and procedures that provide overall direction for operations in line with the Act, regulations and the OMP (including those which ensure OMP compliance, provision of regulatory information, fitness for purpose of facilities – design, integrity management, operation). Have consistency/line of sight between these documents and the OMP and licence conditions</li></ul>

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<input type="checkbox"/> (ca) the manner in which building work (within the meaning of the <i>Planning, Development and Infrastructure Act 2016</i> ) carried out in connection with authorised operations will be assessed against the National Construction Code	Where applicable, provide details of any building work (such as accommodation or offices), and how this building work will be assessed against and meet the National Construction Code.
<input type="checkbox"/> (d) Processes for managing physical, operational, procedural or organisational changes in respect of authorised operations	Provide an outline of your change management processes for physical, procedural, and organisational changes, for ensuring that the regulated activities, modifications and alterations, whether temporary or permanent, are suitably assessed for process safety and operational risks and consequences. This may include a summary of the processes you have in place to ensure that: <ul style="list-style-type: none"><li>• the approval requirements, responsibilities, and competencies of those involved in the change are identified</li><li>• changes are approved by specified named competent individuals commensurate with the risks associated with the proposed change</li><li>• criteria and procedures are in place for conducting and documenting risk assessments, assessing any introduced, inherent and residual risk, at appropriate stages. This includes the controlling changes which may be initiated during the implementation of the activity</li><li>• there is a systematic process for checking operational readiness and the integrity of systems before they are brought into service</li><li>• information and procedures are updated, and suitable training provided in support of the change.</li></ul>



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<p><input type="checkbox"/> (e) Systems that will manage risks allowing achievement of the regulatory objectives arising from undertaking authorised operations including—</p> <p>(i) the controls that will be implemented to eliminate or reduce risks associated with authorised operations; and</p> <p>(ii) the systems that will ensure the implemented controls will be clearly defined and achieved</p>	<p>Summarise risk management system and reference key policies to demonstrate how the systematic identification and treatment of risk (environmental, process, and operational) associated with regulated activities is implemented to ensure compliance with regulatory objectives. This may include:</p> <ul style="list-style-type: none"><li>• reference to environmental risk assessments undertaken</li><li>• summary of process safety risk assessments (such as hazard and operability analyses (HAZOPs), safety management studies (SMS), bowtie risk assessments, Layers of Protection Analysis (LOPA), Process Safety Hazard Analysis (PHA))</li><li>• outline of operational risk management systems (hazard analysis for non-routine tasks, work permitting system, change management system)</li><li>• summary of systems for handling actions and hazards raised through risk assessments or operations; this may include systems for recording, addressing, assigning responsibility for, prioritising, tracking and closing out actions</li></ul>



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	<ul style="list-style-type: none"> <li>reference to corporate risk policy and matrix and how tolerable risk has been clearly defined</li> <li>outline of systems in place for communication of risk though out the organisation and to relevant stakeholders</li> <li>summary of continuous improvement processes.</li> </ul> <p>Summarise the key controls in place for the regulated activity, both mitigative and preventative, to reduce the likelihood of an event (catastrophic failure or major incident) and its potential consequences to an acceptable level, which have been identified, implemented and are demonstrably effective.</p> <p>Provide an outline of the system(s) in place to support controls identified for the purposes of regulation 37(1)(e)(i), ensuring they are maintained within the acceptable level remain fit for purpose</p>
<input type="checkbox"/> (f) Practices and procedures to ensure employees, contractors and visitors to the licence area have the appropriate competency, training (including ongoing training), induction and supervision	<p>Outline how risks associated with regulated activities, and requirements for compliance with the conditions of approval and the OMP, are communicated to employees and contractors. Identify the induction programs in place for visitors/contractors/full-time employees. Summarise the competency/training needs matrix, and how requirements are defined for each position, specifically safety critical roles, field and office. Outline contractor management systems, including qualification, supervision and bridging of management systems specific to the regulated activity/activities being undertaken under the OMP.</p>
<input type="checkbox"/> (g) Mechanisms for consulting and communicating with external parties in relation to authorised operations	<p>Summarise policies, procedures or other mechanisms in place to ensure appropriate, timely and earnest responses and adequate communication with external parties on compliance matters. This includes genuine and ongoing consultation with stakeholders, and effective communication with regulators.</p>
<input type="checkbox"/> (h) Systems to identify, investigate and report incidents arising from authorised operations	<p>Incident investigation and reporting procedure.</p>

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	<p>Summarise how processes ensure incidents are reported (internally and to DEM), classified (internally and as immediately reportable or reportable in accordance with the Act, regulations and licence conditions), investigated and the root cause and other relevant findings are disseminated.</p>
<input type="checkbox"/> (i) Practices and procedures to be followed in the event of an emergency relating to authorised operations	<p>Provide a high-level summary of the structure/hierarchy of emergency response system (i.e. crisis management plan, emergency management plan, emergency response procedures, energy response resourcing i.e., energy equipment inventory stores, available employee or contactor resources). A diagram may be useful. State how the scope of exercises for testing emergency response capabilities are determined and scheduled. Provide any additional information specific to the regulated activity/activities being undertaken under the OMP.</p>
<input type="checkbox"/> (j) The manner in which the effectiveness of a matter referred to in a preceding paragraph will be monitored, evaluated, audited and reviewed	<p>Provide a high-level summary of how audit scope and frequency is planned to achieve regulatory objectives. State how the independence of audits is ensured.</p> <p>Comment on how non-compliances will be recorded, reported, communicated internally for future learning and prevention (also covered under regulation 37(1)(g)) and improvements actioned (action tracking system may also be covered in Regulation 37(1)(c)). Identify systems for tracking compliance with regulatory requirements/legislation at both a corporate and activity specific level.</p> <p>Summarise the applicant's compliance record. This should consider administrative and reporting requirements. Focus on compliance relevant to the operations for which the OMP applies.</p>
<input type="checkbox"/> (l) The day on which authorised operations will, or are proposed to, commence	<p>Applies to new operators only.</p>
<input type="checkbox"/> (m) Any other relevant matter as determined by the Minister	<p>List of contractors – noting requirement to update as this changes.</p> <p>Operation Environmental Management Plan (OEMP) requirements as per approval under the PDI Act - specific management measures or plans for the environmental</p>



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	<p>aspects identified in the PDI Act approval to be incorporated into the OMP. Environmental aspects may include:</p> <ul style="list-style-type: none"> <li>• Noise and vibration</li> <li>• Air quality and dust</li> <li>• Native flora and fauna</li> <li>• Revegetated areas</li> <li>• Aboriginal heritage</li> <li>• Weeds and pests</li> <li>• Traffic and access</li> <li>• Erosion and stormwater management</li> <li>• Site rehabilitation (post operation)</li> <li>• Waste management</li> <li>• Storage and handling of hazardous substances</li> <li>• Water quality</li> <li>• Contamination</li> <li>• Fire risk</li> <li>• Public safety</li> <li>• Emergency response planning</li> <li>• Complaints management</li> </ul>
<p><input type="checkbox"/> Pursuant to section 66(2)(d), requirements under regulation 37(2):</p> <p><input type="checkbox"/> Reg 37(2) allows an approved safety, reliability, maintenance and technical management plan (SRMTMP) approved under the <i>Electricity Act 1996</i> to form part of the licensee's operational management plan if it complies with HRE Act and regulation requirements</p>	<p>To enable the Minister to easily determine which parts of the SRMTMP form part of the OMP, the applicant should make this clear in the OMP. Methods for demonstrating this might include:</p> <ul style="list-style-type: none"> <li>• cross referencing to sections of the SRMPTMP which form part of the OMP requirements within the report</li> <li>• inclusion of a table showing which parts of the SRMTMP form part of the OMP, and to which sections of the Act and Regulations they relate.</li> </ul>
<p><input type="checkbox"/> Provide a copy of the approved SRMTMP</p>	<p>In pdf format</p>