

# MOORABOOL WIND FARM

## Bushfire Mitigation Plan

2021-2022

Electricity Safety (Bushfire Mitigation) Regulations 2013

DATE February 2021

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### Document Control - MN-PM-REP-0064

Document Version	Date	Description	Author (s)	Approved
Revision 0	21/07/20	Initial Plan Draft for comment	D. O'Conner & E. Zorondo	D. Tonkin
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Revision 1.1	19/02/21	Minor changes to reflect ESV comments	E. Zorondo	D. Tonkin

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## Terms and Definitions

Bushfire	Is an unplanned fire. It is a generic term that includes grass fires, forest fires and scrub fires.
Bushfire Protection Areas	Are areas that have been declared as general, medium or high fire risk by local governments and Planning VIC
Bushfire Safer Places	A Bushfire Safer Place is a place of relative safety. It may be used as a first resort for those people who have planned to leave high risk locations early on a bad fire day
Bushfire Survival Plan	Is a plan that enables the department sites to respond effectively to a day of high bushfire danger or a bushfire emergency.
Emergency Services	Means the Country Fire Authority CFA; State Emergency Service SES; Victorian Ambulance Service and Victorian Police responsible for coordinating / combating fires and other local emergencies.
Competent Person'	Means a person who has acquired through training, qualification or experience the knowledge and skills to carry out the task.
Dynamic Risk Assessment	Means the continuous assessment of risk when there are rapidly changing circumstances in order to implement the control measures necessary to ensure an acceptable level of safety.
Employee	For this procedure, Employee refers to Goldwind Australia workers, Contractors and Service Providers.
Fire Ban Districts	Victorian Districts can be found on the CFA Fire Ban web site.
Fire Danger Rating	This forecast is issued by the Bureau of Meteorology (Bureau of Meteorology) each day and is an early indicator of the potential danger, should a bushfire start. The higher the Fire Danger Rating, the more dangerous the fire conditions are.
Hazardous bushfire risk area	The area assigned by the CFA under section 80 of the Act
The Fire Danger Index	This is a numerical value assigned to determine the level of fire danger. It is calculated by considering the weather conditions as well as the amount, type, and dryness of the vegetation. The higher the value, the higher the fire danger rating is.

# 1 Introduction

This Bushfire mitigation Plan has been prepared in response to the Electricity Safety (Bushfire Mitigation) Regulations 2013 - Reg 6 Prescribed Particulars for Bushfire Mitigation Plans—Specified Operators. It covers all aspects of the regulations for a small section of 33kv overhead transmission line crossing the Moorabool River East Branch that forms part of the Moorabool Wind Farm internal collector network. This line is owned and operated by Moorabool Wind Farm Pty Ltd. Goldwind Australia will act as the Warranty Operations and Maintenance Contractor during of the Wind Farm’s operational life.

The Moorabool Wind Farm consists of two sections the north Bungeeltap section of the project known as Stage 1 and the southern Ballark section of the project Known as Stage 2. The project is located, approximately 67 km west of Melbourne, 27 km east of Ballarat, 47 km north of Geelong and 5km south of Ballan. The MWNF project area encompasses rural land holdings with a total area of approximately 5,600 hectares extending approximately 16 km from north to south and approximately 7 km from west to east. A Powercor (TOA) 132kV Overhead Transmission Line (OHL) asset connects the Stage 1 and Stage 2 sites to the Elaine terminal substation.

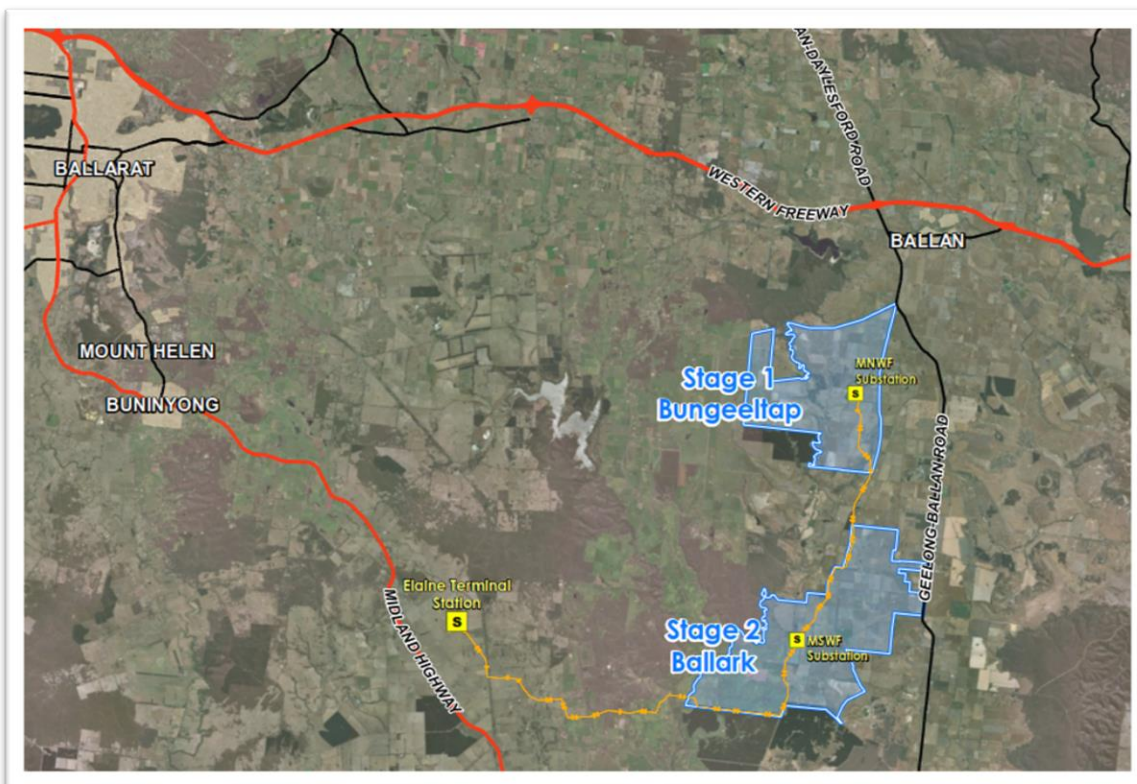


Figure 1.1 map of the Moorabool Wind Farm

## 2 Reg 6 (a-d) Contacts Details

(a) The name, address and telephone number of the specified operator is:

Name: Goldwind Australia Pty Ltd
Address: Goldwind Australia Pty Ltd Level 4, 485 La Trobe Street MELBOURNE VIC 3000
Telephone Number: 03 9912 7853

(b) The position, address and telephone number of the person who was responsible for the preparation of the plan;

Name: Anthony Polidano
Position: HSEQ Coordinator - Service
Address: Goldwind Australia Pty Ltd Level 4, 485 La Trobe Street MELBOURNE VIC 3000
Mobile: +61 436 802 247

(c) the position, address and telephone number of the persons who are responsible for carrying out the plan;

Name: Dean Tonkin
Position: Site Manager
Address: Moorabool Wind Farm 2801 Ballan Meredith Road, Ballan VIC 3342
Mobile: +61 419168301

(d) The telephone number of the specified operator's control room for contact in an emergency that requires action by the specified operator to mitigate the danger of a bushfire is detailed below:

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In case of an emergency the following person should be contacted in the first instance.

This contact phone number is accessible 24 hours 7 days a week.

Name: Dean Tonkin
Position: Site Manager
Address: Moorabool Wind Farm 2801 Ballan Meredith Road, Ballan VIC 3342
Mobile: +61 419168301

### 3 Regulation requirements

This Plan has been prepared to address each requirement of Regulation 6 (a-o) Prescribed particulars for the bushfire mitigation plans – specified operator under the Electricity Safety (Bushfire Mitigation) Regulations 2013 listed in the Table below:

*Table 8-1 Prescribed particulars for the bushfire mitigation plans – specified operator*

Regulation	Requirement	Section found in this plan
6		
(a)	the name, address and telephone number of the specified operator;	Section 2
(b)	the position, address and telephone number of the person who was responsible for the preparation of the plan;	Section 2
(c)	the position, address and telephone number of the persons who are responsible for carrying out the plan;	Section 2
(d)	the telephone number of the specified operator's control room so that persons in the room can be contacted in an emergency that requires action by the specified operator to mitigate the danger of bushfire;	Section 2
(e)	the bushfire mitigation policy of the specified operator to minimise the risk of fire ignition from its at-risk electric lines;	Section 4
(f)	the objectives of the plan to achieve the mitigation of fire danger arising from the specified operator's at-risk electric lines;	Section 5
(g)	a description, map or plan of the land to which the bushfire mitigation plan applies, identifying the	Section 7



	location of the specified operator's at-risk electric lines;	
(h)	the preventative strategies and programs to be adopted by the specified operator to minimise the risk of the specified operator's at-risk electric lines starting fires;	Section 8
(i)	a plan for inspection that ensures that all of the specified operator's at-risk electric lines are inspected at regular intervals of no longer than 37 months;	Section 9
(j)	details of the processes and procedures for ensuring that each person who is assigned to carry out the inspections referred to in paragraph (i) has satisfactorily completed a training course approved by Energy Safe Victoria and is competent to carry out such inspections;	Section 10
(k)	details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j)) who carry out or will carry out functions under the plan are competent to do so;	Section 11
(l)	the operation and maintenance plans for the specified operator's at-risk electric lines— <ul style="list-style-type: none"> <li>(i) in the event of a fire; and</li> <li>(ii) during a total fire ban day; and</li> <li>(iii) during a fire danger period;</li> </ul>	Section 12
(m)	the investigations, analysis and methodology to be adopted by the specified operator for the mitigation of the risk of fire ignition from its at-risk electric lines;	Section 13

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(n)	<p>details of the processes and procedures by which the specified operator will—</p> <ul style="list-style-type: none"> <li>(i) monitor the implementation of the bushfire mitigation plan; and</li> <li>(ii) audit the implementation of the plan; and</li> <li>(iii) identify any deficiencies in the plan or the plan's implementation; and</li> <li>(iv) change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii); and</li> <li>(v) monitor the effectiveness of inspections carried out under the plan; and</li> <li>(vi) audit the effectiveness of inspections carried out under the plan;</li> </ul>	Section 14
(o)	<p>the policy of the specified operator in relation to the assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electric lines.</p>	Section 15

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## 4 Reg 6 (e) Bushfire Mitigation Policy

Goldwind Australia ensures assets are operated and maintained to:

- deliver safe, effective and reliable services
- protect and improve the environment
- meet agreed financial performance targets for the government and the wider community;  
and
- minimise the risk of fire ignition by Goldwind Australia owned and operated high voltage power lines.


Goldwind Australia Emergency Management Plan articulates the organisation's commitment to emergency management, including fire. It outlines Goldwind Australia's emergency management objectives to:

- Prevent or reduce the risks of incidents occurring
- Maintain welfare and confidence of our people, customers, stakeholders and the community
- Minimise the impacts of a disruption
- Ensure that critical stakeholders are kept informed
- Return to normal operations as quickly as possible.

This bushfire risk management plan identifies assets at risk from bushfire and programs to mitigate that risk. The at-risk line consists of two 14-metre-high galvanized steel poles attached to guy wires, containing a single circuit (3 phase) 33kv overhead line measuring 429.42 metres in length above the MREB as shown in Figure 2.1(above)

In determining risk and risk management the international standard for risk management, ISO 31000:2009 is used.

Local plans and procedures in the Moorabool North Wind Farm Emergency Response Plan provides governance in the management of fire risk from power lines.

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## 5 Reg 6 (f) Plan Objectives

The Bushfire Mitigation Plan has been developed to identify possible electrical causes of fire from the Wind Farm and to reduce the likelihood and consequences of these through the implementation of various preventative measures.

The following Legislative and Regulatory requirements provide guidance on how to minimize bushfire risks from the at-risk electric line identified in this Plan:

- Section 83B of the Electricity Safety Act 1998,
- Section 84D of the Electricity Safety Act 1998 and
- Regulation 6 of the Electricity Safety (Bushfire Mitigation) Regulations 2013
- Regulation 9 of the Electricity Safety (Electric Line Clearance) Regulations 2020
- Approved MNWF Electric Line Clearance Management Plan

## 6 Network Description

The site has been historically cleared however some isolated patches of native vegetation exists along roadsides, the Moorabool River East Branch (MREB) which intersect the northern section of the site and within the site itself. The northern section of the site consists of 50 turbines with four (4) internal underground 33kv collector groups that all feed from turbine locations to the site's substation as shown in Figure 1.2. To reduce cultural heritage risks it was determined that the internal Collector Group 4 connecting turbine BUWT29 to BUWT34 would not be buried entirely underground instead a small section (of at risk electric line) would span across the river.

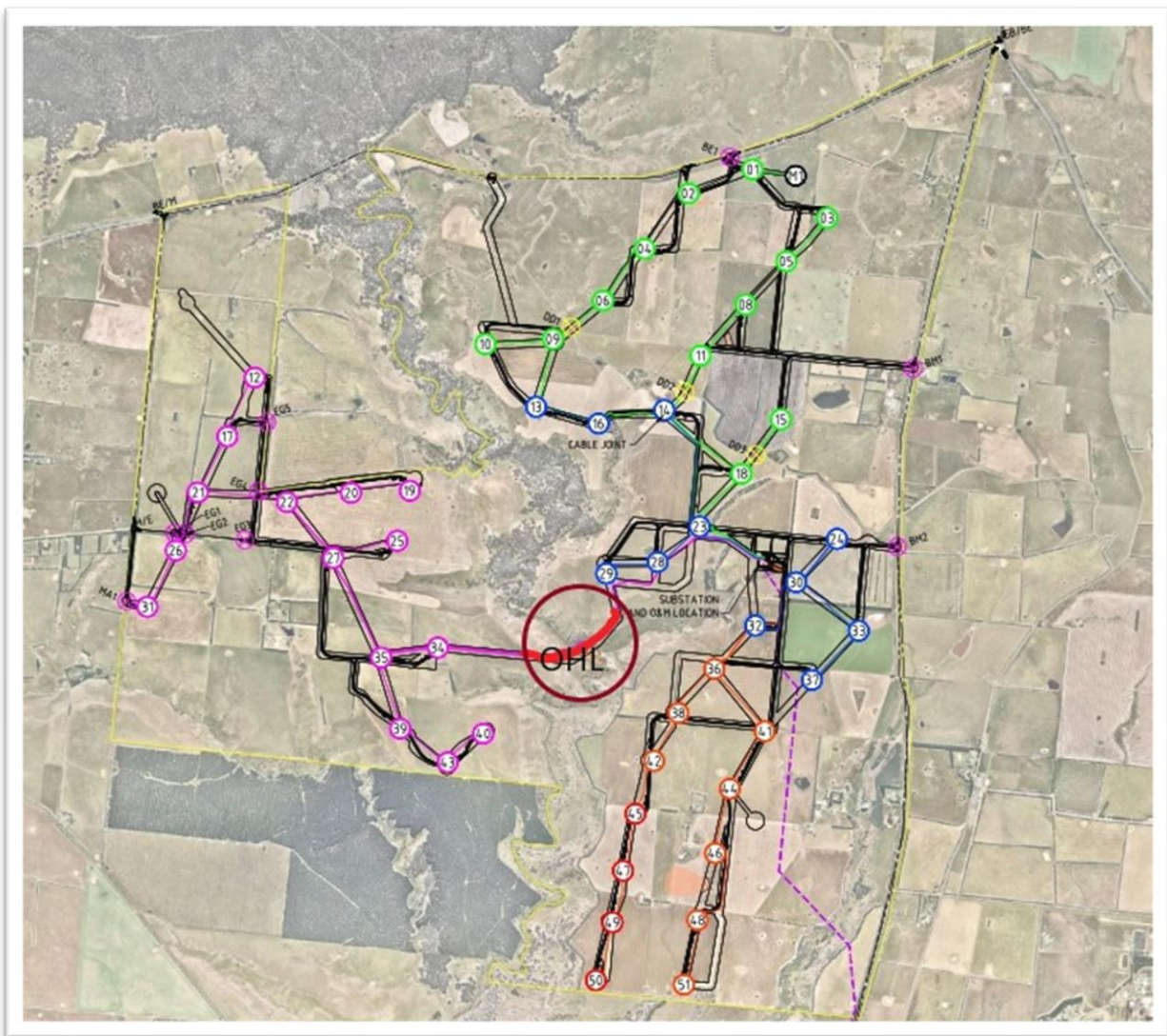


Figure 6.1 site map of the Moorabool North Wind Farm and at risk electric line

## 7 Reg 6 (g) At risk electric lines description and map

The at risk line consists of two 14 metre high galvanized steel poles attached to guy wires, containing a single circuit (3 phase) 33kv overhead line measuring 429.42 metres in length above the MREB as shown in Figure 2.1. This is the only Overhead Line (OHL) that GWA has responsibility for at either of the Moorabool sites and is the short section (429m) of single span 33kV OHL between the substation and Collector Feeder 4. The Plan applies to land within a High Bushfire Rated Area (HBRA).



Figure 7-1 location of the Overhead line and poles across the Moorabool River East Branch

Table 7-1 Details of OHL pole locations

Pole number	X Coordinate of pole	Y Coordinate of pole
1	251170.56	5828268.7
2	250773.99	5828103.9

## 8 Reg 6 (h) Prevention Strategies

Goldwind Australia's Emergency Management Policy articulates the organisations commitment to emergency management, including fire. It outlines Goldwind Australia's emergency management objectives to:

- Prevent or reduce the risks of incidents occurring
- Maintain welfare and confidence of our people, customers, stakeholders and the community
- Minimise the impacts of a disruption
- Ensure that critical stakeholders are kept informed
- Return to normal operations as quickly as possible.

Goldwind Australia ensures assets are operated and maintained to:

- deliver safe, effective and reliable services
- protect and improve the environment
- minimise the risk of fire ignition by Goldwind Australia owned and operated high voltage power lines.

Goldwind Australia achieve this through the following preventative strategies an programs:

- Planned annual inspections of infrastructure including overhead lines and 33kv structure inspections.
- Competent technicians undertaking inspections using thermal imaging cameras
- Completion and reporting of any identified issues or damages using internal hazard reporting system, myosh, and logging preventative program inspections
- Documenting inspections and results utilising Goldwind Australia documents;
  - GWA-OM-CHE-0008 Overhead Line Patrol and Visual Condition Inspection
  - GWA-OM-CHE-0009 33KV Structure Inspection

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## **Activation of the Bushfire Survival Plan**

Managers/supervisors are required to make sure conditions at each relevant worksite are monitored on Extreme and Catastrophic Fire Danger Rating days. This can be monitored by:

- monitoring the CFA website - <https://www.cfa.vic.gov.au/plan-prepare/your-bushfire-plan>
- listening to the local ABC radio station.

Line Managers/supervisors must tailor their plans relevant to their operations and ensure they are practiced and activated when the Fire Danger Rating is forecast as Extreme or Catastrophic for the fire district.

When Bushfire Survival Plans are activated, managers/supervisors shall prepare the site for a fire and the outcomes of decisions are communicated to workers.


On days declared as Extreme or Catastrophic Fire Danger rating outside of the fire danger season managers/supervisors must activate the Bushfire Survival Plan at any time of the year.

In accordance with the Fire Management Planning process, Goldwind Australia has developed bushfire risk management plan identifying assets at risk from bushfire and programs to mitigate that risk. The at-risk line consists of two 14-metre-high galvanized steel poles attached to guy wires, containing a single circuit (3 phase) 33kv overhead line measuring 429.42 metres in length above the MREB as shown in Figure 2.1.

Goldwind Australia has developed the Electric Line Clearance Management Plan which outline our responsibilities for clearing vegetation to manage the fire risk from powerline on our area of operation and ensure our compliance with relevant legislation.

Local plans and procedures at the Moorabool Wind Farm include the Team Bushfire Survival Plan and Emergency Response Plan.



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## 9 Plan Availability Reg 6 (i) A plan for inspection;

This plan is available for public inspection, in accordance with section 83BA (a) and (b), following acceptance of the plan by Energy Safe Victoria. The Plan will be available on the Project's website and for viewing during normal business hours (8am to 5pm) or on request at Goldwind Australia Head Office located on Level 4/845 La Trobe Street, Melbourne, Vic 3000.

The Electric Line Management Clearance Plan – Asset Protection Zone (APZ) details the annual vegetation inspection and clearance works required for the overhead line:

### **Scope of bushfire prevention work**

#### **1 Site Inspections**

Inspections shall be performed in liaison with the local CFA Team Leader and undertaken by staff experienced in civil works, vegetation management and bushfire control.

#### **2 Fuel**

The surface fine fuel and elevated fuel in the APZ's is to be monitored as frequently as necessary dependent on vegetation regeneration and other conditions.

Monitoring and assessment are to be undertaken no later than September each year and is to continue on an as required basis for the duration of the bushfire danger period as defined by the relevant regional CFA Bushfire Management plans.

Asset Protection Zone (APZ) is part of the Emergency Management and incorporates the approved scope of vegetation control for bushfire hazard management. APZ dimensions have been determined using the VIC CFA documents: Building in Bush Fire Prone Areas Single Dwelling; and Planning for Bush Fire Protection (2006).

Features of the location or site that affect the level of risk include:

- access and egress both to the location or site within it
- proximity to established urban or township areas
- vegetation on site that planning schemes seek to protect.

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## **10 Reg 6 (j) details of the processes and procedures for competency and training to carry out inspections;**

Goldwind Australia engages suitably qualified contractor(s) to undertake maintenance inspections of our HV overhead power lines in the Moorabool area. The qualifications of internal and external contractors are reviewed and verified before engagement to ensure they meet the minimum level established by the Victorian Electricity Supply Industry (VESI) and, therefore, meet the Australian Qualification Framework (AQF) requirements or equivalent. This ensures that people undertaking the inspections have the relevant qualifications and licences.

It is a Goldwind Australia contractual requirement that all employees and contractors engaged to carry out cyclic inspection of overhead power line assets including poles must have minimum of Certificate II in Asset Inspection – UET20612. Where this qualification has been attained in a State of Australia other than Victoria, induction shall be conducted by a person holding a Certificate IV in Training and Assessment at a minimum, and include information on Victorians Acts, Regulations, Codes of Practice, Safety Rules, Industry Guidelines and Asset Identification.

Goldwind Australia and its contractors maintain the records of relevant authorisation and review to ensure re-authorisation shall occur at intervals not exceeding a three-year period.

### **Asset Inspection plan**

Routine inspections will be undertaken by suitably qualified and competent employees and/or contractors, as identified above.

Inspection timeframes will align with seasonal change moving into the higher fire danger period of summer. All inspections will be completed annually by the last business day of November

All documents will be stored internally on Goldwind Australia systems and monitored for completion, accuracy and identified issues by site management and HSEQ.

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## **11 Reg 6 (k) details of the processes and procedures (other than persons referred to in paragraph (j)) to ensure competency in roles;**

Goldwind Australia engages suitably qualified contractor(s) to undertake maintenance activities associated with our HV overhead power lines in the Moorabool area. The qualifications of internal and external contractors are reviewed and verified before engagement to ensure they meet the minimum level established by the Victorian Electricity Supply Industry (VESI) and, therefore, the Australian Qualification Framework (AQF) requirements or equivalent.

All contractors and sub-contractors engaged to manage vegetation near electric power lines must have minimum of Certificate II in ESI Powerline Vegetation Control – UET20312.

Verifications of all contractors and subcontractors is undertaken at the point of initial engagement utilising Goldwind’s third party contractor management system, CM3, to ensure all qualifications and licenses are correct and up to date, insurances and health and safety documentations are valid and representative of the works that are to be undertaken. Regular auditing of contractors in this system is undertaken by the departmental HSEQ team.

In addition to the contractor management system, all contractors and subcontractors are subject to compliance with Goldwind Australia’s Contractors and Consultants Prequalification Procedure (GWA-HSE-PRC-0021 Contractors and Consultants Prequalification Procedure).

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## **12 Reg 6 (l) the operation and maintenance plans for at-risk electric lines:**

### **During a fire event**

In the event of a fire in the Moorabool Windfarm area, Goldwind Australia staff will immediately contact emergency services and respond as outlined in the site Emergency Response Plan. If a fire is confirmed and has the potential to impact High Voltage lines, suitably trained technicians will conduct appropriate High Voltage switching works, to isolate the supply if safe to do so,

### **Total Fire Ban days**

The risk of certain work activities starting a fire or staff being caught in a dangerous environment as a result of a fire is extremely high on a Total Fire Ban (TFB) day. To help manage this risk, Goldwind Australia has guidelines, procedures, instructions and a hot works permit process that must be adhered to on TFB days, including declared Severe, Extreme or Code Red conditions under the National Fire Danger Rating system and as advised by the CFA.

On fire danger days declared as Severe, Extreme or Code Red under the National Fire Danger Rating system Goldwind Australia will defer High Voltage Switching Operations where practical or restrict operations to essential activities to maintain critical services. In the event a plant has experienced a High Voltage feeder fault, a visual inspection of the relevant feeders is conducted to ensure the fault has not initiated a fire.

The risk of the Moorabool Wind Farm HV line starting a fire has been reduced through design. The lines are insulated (ABC) and each of the HV lines are protected by Vacuum circuit breakers, which are set to one shot lock out. The following elements of the protection relay are enabled:

- Phase overcurrent protection
- Earth fault protection

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### **Fire danger period**

Goldwind Australia inspection and maintenance programs for asset condition and vegetation clearance are completed prior to the beginning of a fire danger period, to ensure electrical assets are clear and operating during this period. Therefore, maintenance operations around electrical assets during the fire danger period would be restricted to fault investigation or emergency works, lowering the risk of potential fire ignitions during this high-risk period.

The design features of the HV line (discussed above) also help to mitigate bushfire risk during the fire danger period.

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## **13 Reg 6 (m) the investigations, analysis and methodology adopted for the mitigation of the risk of fire ignition from its at-risk electric lines;**

Goldwind Australia applies a condition based maintenance approach to ensure mitigation of fire ignition risk from our at-risk electric line. Periodic inspections and works are undertaken to ensure the possibility of causing an ignition source from HV overhead lines is minimised by:

- Completing annual inspections and completing actions identified during inspections to maintain appropriate vegetation clearance.
- Completing inspections every 3 years and repairing any identified defects during inspections to ensure electrical assets are in good working order and are operating in such a way as to mitigate the risk of fire ignition.

Any safety issues or incidents relating to the electrical assets are investigated using Goldwind Australia's incident management system MyOSH. The incidents recoded in MyOSH are reviewed by a team of senior managers and assigned to the most appropriate person to action within a given time frame. The status of actions not completed within the specified time period is escalated to the next level up in the organisational hierarchy through internal reporting processes. The peak point of escalation is the Managing Director.

The assignee of the MyOSH action will typically be directed to investigate and determine the root cause of the incident as outlined in the incident reporting and investigation procedure. Tasks undertaken to achieve this objective include:

- Site visits and information collection including photos and samples of materials.
- Conduct brain storming session with relevant people of various expertise if required

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- Engage technically qualified persons (most instances a consultancy firm) to perform detailed analysis and recommend corrective actions to prevent recurrence of similar incident.

The risks associated with electrical assets (including bushfire risk) are reviewed annually. This process involves determining the consequence and likelihood of potential asset failure scenarios (using the Risk Management Procedure) and evaluating the effectiveness of mitigation strategies currently in place. Risk ratings are used to determine and prioritise improved mitigation actions to reduce all risks to 'as low as practical'.

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## **14 Reg 6 (n (i-vi)) details of the processes and procedures by which the specified operator will:**

As part Goldwind Australia Audit and Inspection Procedure an audit and inspection schedule (GWA-CO-TMP-005 Audit and Inspection Schedule\_MNWF) is maintained and a yearly audit and inspection of the OHL is planned before the beginning of each fire season.

### ***I. Monitor the implementation of the bushfire mitigation plan.***

Goldwind Australia Service Department have defined works planned for the upcoming twelve (12) month period, utilising a system that defines in detail; task, start/finish dates, percentage progress etc, for all its operational wind farm sites. This Plan is developed prior to the commencing operating period and involves departmental, site based and HSEQ management consultation and involvement and is undertaken by a dedicated regional Service Planner.

The plan has been developed to incorporate components that are specific to the requirements of MNWF and is held as an overarching Annual Compliance Plan which is tracked using the Annual Compliance Tracker.

All requirements for compliance and preventative inspections and works are tracked in this high-level plan, including reviewing of the Bushfire mitigation Plan which is monitored weekly and reviewed monthly by senior departmental management and reported on by the Service Planner and Site Manager monthly.

Tasks that ensure the implementation of the plan are to be included on the Annual Compliance Plan and monitored accordingly.

### ***II. Audit the implementation of the plan.***

The Bushfire Mitigation Plan will be audited by appropriately competent HSEQ employees in line with the requirements of the plan and evidence supporting the completion of items/tasks to confirm compliance.



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### ***III. Identify any deficiencies in the plan or the plan's implementation***

All deficiencies or non-conformances to the plan and its implementation will be noted in the audit and review of the plan by the appropriately competent HSEQ employee and logged in Goldwind's HSEQ reporting system, Myosh, as an action and non-conformance or opportunity for improvement to be rectified against the audit.

### ***IV. Change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph.***

All identified and recorded deficiencies and non-conformances required to be rectified will be included in the updated review of the Bushfire Mitigation Plan that is subsequently revised and updated at each review period or on identified deficiencies through the audit and review process.


### ***V. Monitor the effectiveness of inspections carried out under the plan.***

Inspections are reviewed through the WHS Audit process inline with consultation between the reviewing party, Goldwind Australia HSEQ Service department employees, and the Goldwind Australia Site Service Manager. As required, Goldwind Australia will seek independent, third party intervention or review of the inspections to ensure quality standards are met for inspections and due diligence of inspecting parties.

All equipment utilised for inspections, thermal imaging cameras, are checked for correct operation and calibrated as required and inline with manufacturer specifications.

### ***VI. Audit the effectiveness of inspections carried out under the plan.***

WHS audit schedule encompasses reviews of inspections and documentations and identifies any opportunities for improvement and non-conformances. Inspection effectiveness does not form a direct audit item or outcome, however any discrepancies identified between inspections and onsite reviews are to be followed up with site and departmental management with further requirements for independent third party verification of effectiveness of inspections to be instigated as required.

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## **15 Reg 6 (o) assistance to be provided to fire control authorities in the investigation of fires near at-risk electric lines.**

Goldwind Australia has proactively developed positive and open cooperation with the Country Fire Authority (CFA). Upon commissioning of the Wind Farm the CFA and other emergency services will be invited to attend a site familiarization visit. The Project has provided DELWP with spatial data of the site to assist in the event of an emergency.

Bushfire planning and mitigation on the Moorabool Wind Farm Sites is undertaken in conjunction with these agencies. Goldwind Australia will assist Fire Control Authorities in their investigation of fires near our at-risk electric lines by:

- Assisting with safe access to assets
- Making assets safe before commencement of investigations including, where appropriate, isolating power
- Sharing appropriate information regarding an incident and related inspection or maintenance reports
- Inviting external authorities to attend incident investigations as required.