



Directlink Safety Management System Annual Performance Report

Safety Performance
(1 July-30 June 2024)

Bushfire Preparedness
(1 October 2023- 30 September 2024)

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1. Annual Performance Reporting Overview

1.1. Network Safety & Reliability

Directlink activities to comply with Australian Standard AS 5577-2013 *Electricity network safety management systems* and other relevant regulation are documented in the Directlink Safety Management System Plan (SMSP).

Directlink continues to implement and run programs designed to improve its safety and reliability. Directlink undertakes regular assurance activities and risk assessments to review the effectiveness of its activities and programs in relation to managing safety, performance and reliability of the interconnector. This provides a structured approach to identifying opportunities for improvement.

Directlink staff are encouraged to continually innovate the way they carry out their work and to strive for improved safety outcomes through HSE recognition callouts at the weekly safety meeting and nomination at the annual safety awards. Staff are recognised and can be nominated for their achievements and innovative methods for improving the overall safety of Directlink for staff, contractors, the environment, property and the public. No non-compliances were identified during the period 1 July 2023 to 30 June 2024.

Table 1.1: Non-compliances relating to the safety & reliability of the electricity network

Identified non-compliances	Actions against non-compliance	Progress of Actions
No identified non-compliances	N/A	N/A

1.2. Public Awareness

Directlink maintains an ongoing involvement with the Before You Dig Australia service in NSW. This service provides an external interface for the public to access information about the location of Directlink operating equipment and informs Directlink of any possible or actual threats. This facilitates the effective management of third party works that have the potential to impact Directlink.

Directlink has continued to undertake a number of activities throughout the year in relation to public awareness and safety, including ongoing landowner communication processes and vegetation management reporting. Signage along the cable route has also been maintained to ensure the safety of the public.

Directlink engages with the NSW Fire and Rescue to ensure familiarisation with the Directlink assets. The aim of this is for the local NSW Fire and Rescue to be aware of the risks at the Directlink converter stations and the Directlink cable route in advance of any emergency.

With the addition of a Rail Trail adjacent to section of the Directlink cable path, Directlink continues to work with the council to ensure any risks from Directlink associated with increased public access are managed appropriately.

1.3. Bushfire Management

Management of bushfire risk is supported by ongoing vegetation management and cable route inspections.

Directlink’s operating and maintenance procedures include safety protocols relating to hot works, and any other activities that could cause ignition. All hot work is managed in accordance with APA’s risk assessment and permit issuing processes, including consideration of any total fire bans in place.

APA’s national Bushfire Management Plan (320-PL-ER-0016) is designed to further mitigate the risk and impacts of bushfire. This document sets out roles and responsibilities for managing bushfire risk, mechanisms for identifying bushfire hazards and bushfire control measures. This document is supported by APA’s Bushfire Action Plan (320-PL-ER-0019), which sets out actions for enabling APA personnel to prepare for and respond to a bushfire threat and recover after the event.

There have been no events or incidents associated with bushfire risk management at Directlink. In addition, Directlink has not identified any non-compliances with its ENSMS, the Directlink SMSP, in relation to the bushfire management process.

No complaints were received during the reporting period regarding Directlink’s bushfire management activities.

Table 1.2: Non-compliances relating to the management of bushfire risk

Identified non-compliances	Actions against non-compliance	Progress of Actions
No identified non-compliances	N/A	N/A

1.4. Contextual Information

1.4.1. Deviation from standards

Directlink is a single asset rather than a network that evolved over time (i.e. Directlink is not an expanding network), consequently Directlink does not deviate from the standards specified in the ENSMS for Directlink.

1.4.2. Significant community infrastructure

Directlink provides inter regional transmission services between Powerlink and Essential Energy networks and as such does not directly supply power to any significant community infrastructure.

1.5. Formal Safety Assessment

1.5.1. Classification of risk levels

Directlink endeavours to implement both direct and indirect controls to mitigate residual risk levels to intermediate or lower. Directlink also operates under a permit to work system to ensure intermediate (moderate) and / or high-risk work is only undertaken by appropriately trained and qualified personnel.

Directlink applies the following risk classification levels:

- **Negligible and low risks** are those manageable by routine plans and procedures (Job Hazard Assessments and Safe Work Method Statements). Proper diligence and care must be exercised and reasonable steps / precautions taken to ensure the risk level is controlled and monitored for changes which could affect the risk classification.
- **Intermediate (moderate) risks** are those risks that require special controls to be identified and implemented. Work can proceed once a supervisor has confirmed the risk controls have been identified and implemented. Proper diligence and care shall be exercised and reasonable steps / precautions are taken to ensure the risk level is controlled to as low as reasonably practicable. Regular monitoring of the effectiveness of controls is required.
- **High risks** occur when effective controls are difficult to implement or not available.
 - Where a high risk is encountered work must not proceed and immediate action is required to eliminate or minimise health, safety &/or environmental risks, as far as is reasonably practicable.
 - If not practicable to do so, all appropriate control measures must be applied and the risks escalated to the appropriate management level for approval before work can commence. The relevant business General Manager must approve high risk work. Monitoring of changes, which could affect the risk classification, must be carried out.
- **Extreme risks** will not be allowed to proceed and must have controls implemented to reduce the residual risk to High.

1.5.2. Risks within the scope of the ENSMS

The risks incorporated into the Directlink ENSMS include:

- Operational and maintenance non-conformance;
- Operational and maintenance staff and contractor safety;
- Substandard reliability;
- Public safety and asset awareness;
- Protection of property;
- Bushfire causation and impact;
- Emergency management and abnormal operating conditions;
- Technical change management;

Currently the risk of substandard reliability is not ALARP. A number of substandard reliability risks remain at an intermediate level and Directlink has a program of capital expenditure to implement systemic changes that will reduce these risks.

1.5.3. Formal safety assessment reviews

Directlink reviews risks within its Formal Safety Assessments (FSA) Register on both a formal and informal basis. Additionally, risk controls are reviewed as part of the day-to-day preparation of safe work method statements and job hazard assessments.

1.6. Safety risk management actions

Directlink utilises the APA safety management system for ENSMS safety risk management actions. The APA safety management system incorporates a workflow process within the Safeguard Plus system for incident reporting, investigation, and corrective actions. Each step of the workflow process is automatically monitored with alerts to trigger managerial action when a due date is approaching.

Table 1.3: Risk management actions – Open, Completed and Raised

Criteria	Number
Number of risk management actions within the ENSMS scope that were raised in the reporting period	0
Number of open safety risk management actions within the ENSMS scope from any reporting year	0
Percentage of safety risk management actions within the ENSMS scope completed by the due date within the reporting year	N/A
	No new actions raised

1.7. Compliance with directions

Directlink has not received any directions from IPART during the current reporting year. Directlink currently has no outstanding compliance actions associated with directions from IPART.

Table 1.4: Directions issued by IPART

Directions issued by IPART	Number
Nil	0

2. Annual safety performance report

2.1. Annual Performance Reporting Framework

The annual safety performance information detailed in the following tables is based on a financial year calendar. All reporting relating to the current period is for 1 July 2023 to 30 June 2024.

2.1.1. Tier 1: Major Incidents

There were no major incidents for Directlink during the reporting period.

Table 2.1: Major Incidents

ESSNM Objective	Description of each major incident reported under the incident reporting requirements
Safety of members of the public	Nil
Safety of persons working on the network	Nil
Protection of property – 3 rd Party property	Nil
Protection of property – Network Property ¹	Nil
Safety risks arising from the loss of electricity ²	Nil

¹ Network property losses are not reportable under IPART’s Reporting Manual - Incident Reporting requirements. For the purpose of this Reporting Manual, a network operator is to report each event in which losses exceed \$500,000 in relation to damage caused to electricity works as defined in the *Electricity Supply Act 1995*.

² As defined for major reliability incidents in IPART’s Reporting Manual – Incident Reporting.

2.1.2. Tier 2: Incidents

There were no Tier 2 incidents for Directlink during the reporting period.

Table 2.2: Incidents

ESSNM Objective	Description of each major incident reported under the Reporting Manual - Incident Reporting requirements
Safety of members of the public	Nil
Safety of persons working on the network	Nil
Protection of property – 3 rd Party property	Nil
Safety risks arising from the loss of electricity ¹	Nil

¹ As defined for reliability incidents in IPART’s Reporting Manual – Incident Reporting.

2.1.3. Tier 3: Control failure near misses

Directlink network failures that occurred during the period are detailed in the tables below.

Table 2.3: Network Asset Failures

Performance measure	Asset population or length	5-year average annual functional failures	Annual Functional		
			No fire	Unassisted	
				Contained	Escaped
Towers	N/A	N/A	N/A	N/A	N/A
Poles	N/A	N/A	N/A	N/A	N/A
Pole top structures / components	N/A	N/A	N/A	N/A	N/A
Conductor – Transmission OH	0.2 km	0	0	0	0
Conductor – Transmission UG	6.54 km	5	4	0	0
Conductor – High Voltage OH	N/A	N/A	N/A	N/A	N/A
Conductor – High Voltage UG	N/A	N/A	N/A	N/A	N/A
Conductor – Low voltage OH	N/A	N/A	N/A	N/A	N/A
Conductor – Low voltage UG	N/A	N/A	N/A	N/A	N/A
Service line OH	N/A	N/A	N/A	N/A	N/A
Service line UG	N/A	N/A	N/A	N/A	N/A
Power transformers	6	0.2	0	0	0
Distribution transformers	N/A	N/A	N/A	N/A	N/A
Reactive plant	72	0.6	0	0	0
Switchgear – zone / subtransmission / transmission substation	30	3	0	0	0
Switchgear – distribution (Overhead)	N/A	N/A	N/A	N/A	N/A
Switchgear – distribution (Ground Based)	N/A	N/A	N/A	N/A	N/A
Protection relays or systems	4	5.4	0	0	0
SCADA – zone / subtransmission / transmission substation	1	3.6	8	0	0
Batteries – zone / subtransmission / transmission substation	14	2	2	0	0

Table 2.4: Vegetation

Performance Measures	contact with conductors				
	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	Event Count (Four periods ago)
Fire starts - grow in	0	0	0	0	0
Fire start - fall in and blow in	0	0	0	0	0
Interruption - grow in	0	0	0	0	0
Interruption - fall in and blow in	0	0	0	0	0

Table 2.5: Unintended contact, unauthorised access and electric shocks

Performance Measures	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	Event Count (Four periods ago)
Electric shock and arc flash incidents originating from network assets including those received in customer premises					
Public	0	0	0	0	0
Public Worker	0	0	0	0	0
Network employee / contractor	0	0	0	0	0
Accredited service provider	0	0	0	0	0
Livestock or domestic pet	0	0	0	0	0
Contact with energised overhead network asset (e.g. conductor strike)					
Public road vehicle	0	0	0	0	0
Plant & Equipment	0	0	0	0	0
Agriculture and other	0	0	0	0	0
Network Vehicle	0	0	0	0	0
Contact with energised underground network asset (e.g. conductor strike)					
Plant & Equipment	0	0	0	0	0
Person with hand tool	0	1	0	1	0
Unauthorised network assets (intentional)					
Zone / BSP / Transmission substation / switching station	0	0	0	0	0
Distribution substation	0	0	0	0	0
Tower / poles	0	0	0	0	0

Performance Measures	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	E (F
Other (e.g. communication sites)	0	0	0	0	
Safe Approach Distance (SAD)					
Network employee / contractor	0	0	0	0	
Accredited Service Provider	0	0	0	0	
Public	0	0	0	0	
Public Worker	0	0	0	0	

Table 2.6: Reliability & quality of supply

Performance Measures	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	Event Count (Four periods ago)
High voltage into low voltage	N/A	N/A	N/A	N/A	
Sustained voltage excursions outside emergency range	0	0	0	0	
Reverse polarity	0	0	0	0	
Neutral integrity due to poor workmanship or incorrect procedure	0	0	0	0	
Neutral integrity due to asset defect or failure	0	0	0	0	

Table 2.7: Reliability & quality of supply – Critical infrastructure incidents

Directlink provides inter regional transmission services between Powerlink and Essential Energy networks and as such does not directly supply power to any significant community infrastructure.

Type of critical infrastructure (e.g. hospital, tunnel)	Minutes of supply lost	Cause	Consequential safety impacts associated with the incident
N/A	N/A	N/A	N/A

Table 2.8: Network-initiated property damage events

Performance Measures	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	Event Count (Four periods ago)
Third Party property (assets including vehicles, buildings, crops, livestock)					
Damage (e.g. fire, physical impact or electrical)	0	0	0	0	
Network property (including non-electrical assets including vehicles)					
Damage (e.g. fire, physical impact or electrical)	0	0	0	0	

2.1.4. Tier 4: Control**implementation****Table 2.9: Amendments and improvements to Formal Safety Assessments (FSA) or associated risk treatments**

FSA Risk Item	Amendments / improvements
Nil	Nil

Table 2.10: Design, construction and commissioning

Performance Measures	Event Count (Current period)	Event Count (Prior period)	Event Count (Two periods ago)	Event Count (Three periods ago)	Event Count (Four periods ago)
Designs for which Safety in Design (SiD) Reports have been completed	0	0	0	0	0
Designs for which Safety in Design (SiD) Reports have been audited	0	0	0	0	0
Contestable designs certified	N/A	N/A	N/A	N/A	N/A
Contestable level 1 project safety reviews performed	N/A	N/A	N/A	N/A	N/A
Contestable level 2 project safety reviews performed	N/A	N/A	N/A	N/A	N/A
Non-contestable project safety reviews performed	N/A	N/A	N/A	N/A	N/A
Project closeout reports completed for contestable projects	N/A	N/A	N/A	N/A	N/A
Project closeout reports completed for non-contestable projects	N/A	N/A	N/A	N/A	N/A
Project closeout reports audited for contestable projects	N/A	N/A	N/A	N/A	N/A
Project closeout reports audited for non-contestable projects	N/A	N/A	N/A	N/A	N/A

Table 2.11: Inspections (Assets)

Performance Measures	Inspection tasks		Tasks identified (all categories)	Corrective action tasks				Comment
	Annual Planned	Achieved		Identified	Achieved	Open	Outstanding	
Transmission substations ¹	121	121	N/A	24	24	0	0	
Zone substations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Distribution Substations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

Performance Measures	Inspection tasks		Tasks identified (all categories)	Corrective action tasks				Comment
	Annual Planned	Achieved		Identified	Achieved	Open	Outstanding	
Transmission OH	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Transmission UG	12	12	12	4	4	0	0	
Distribution OH	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Distribution UG	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

¹ Directlink has converter stations in Bungalora and Mullumbimby. This row includes inspection and corrective action tasks relating to the converter stations' electrical infrastructure.

Table 2.12: Inspections (vegetation) Aerial / Ground based

Bushfire Risk Category	Population (spans/poles)	Target	Achieved	Outstanding	
Aerial					
N/A	N/A	N/A	N/A	N/A	
Ground Based					
Cable route	60 km	60 km	60 km	0	Vegetation along maintained over

Table 2.13: Public electrical safety plans and activities

Network operator public safety programs / campaigns	Details
BYDA	The Before You Dig Australia (BYDA) service provides an external interface for third party works that have the potential to affect APA assets, allowing them to check for threats or to seek information on the location of Directlink assets.
Signage	Directlink continues to undertake replacement and maintenance of warning and signage along transmission line route.
Vegetation	Directlink undertakes continual vegetation management along the route to mitigate bushfire risks.
NSW Fire & Rescue engagement	Directlink liaises with NSW Fire & Rescue to ensure familiarisation with the Directlink route.
Landholder engagement	Directlink engages with relevant landholders along the Directlink route to address bushfire risks.

Table 2.14: Internal audits performed on any aspects of the ENSMS (per AS 5577 clause 4.5.4)

Audit Scope	Identified non-compliance	Actions
<p>Desktop review of Directlink’s compliance with its Safety Management System Plan (SMSP) and AS 5577.</p>	<p>1) The Directlink organisation structure changed in February 2024, which has not been reflected in section 3 of the SMSP.</p> <p>2) The SMSP states that work will be undertaken in accordance with the policies and procedures listed in Appendix B of the SMSP. Discussion with site management indicated that a formal process for the review and update of specific Directlink policies and procedures is not in place.</p> <p>3) A training matrix has been developed to identify the training needs of Directlink staff. A review of the May 2024 training reports in the Learning Management System highlighted that training had expired for three staff members.</p>	<p>1) Update section 3 of the SMSP by November 2024.</p> <p>2) Implement the policies and procedures listed in Appendix B of the SMSP by December 2024.</p> <p>3) Implement the training matrix for overdue training by November 2024.</p>

Table 2.15: External audits performed on any aspects of the ENSMS (per AS 5577 clause 4.5.4)

Audit scope	Identified non-compliance	Actions
Nil	Nil	Nil



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