

January 28, 2014

Claudine Bradley
National Energy Board
444 Seventh Avenue SW
Calgary, Alberta T2P 0X8

Re: Review of Draft Safety Culture Framework – comments and questions

Dear Ms. Bradley:

Thank you for providing the invitation for input related to the Draft Safety Culture Framework, *Advancing Safety in the Oil and Gas Industry*, to the Nova Scotia Government.

Both the Nova Scotia Department of Labour and Advanced Education and the Department of Energy have reviewed the Draft Safety Culture Framework in detail and fully support the joint effort by the three Offshore Boards to advance a strong safety culture in the oil and gas industry. We also recognize the development of a Safety Culture Framework as a critical piece in moving this work forward.

In similar efforts, Nova Scotia released a five year *Workplace Safety Strategy* in March 2013. The vision of our strategy is for workers, employers, industry and labour leaders, government, and all partners in safety, to work together to ensure Nova Scotia is the safest place to work in Canada. Our strategy recognizes no person or organization can do it alone, but collective effort and strong leadership is required in all industries – including the Offshore. You can find the link to our strategy here -<http://novascotia.ca/lae/documents/WorkplaceSafetyStrategy.pdf>.

The Draft Safety Culture Framework prepared by the three Offshore Boards clearly epitomizes many of the same premises and approaches as Nova Scotia's *Workplace Safety Strategy*. Our Strategy is built around five key pillars, including a "Culture Pillar" that specifically focuses on creating, fostering and broadening both public and industry awareness on safety issues and their importance. We believe creating a culture of safety that permeates all aspects of a workplace and the mindset of the workers within the organization is critical to both challenging and changing negative, complacent and tolerant attitudes towards safety. Improved safety outcomes and safety cultures also rely on increased public awareness of the importance of safety for all workers – and the right to return home safe at the end of each day.

As the Draft Safety Culture Framework indicates, it is important safety management systems that identify and eliminate risks and hazards should be incorporated into the strategic plans of all companies, as well as solid performance measures. The Draft Safety Culture Framework also correctly details the risks that arise from internal budgeting pressures and limited allocated

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resources towards safety measures. We would agree that building a safety culture requires a changing of attitudes and acceptance of the role safety plays daily on a worksite but we must also challenge companies and executives to financially support safety improvements through training, equipment and education.

Nova Scotia would also like to suggest the following questions be considered in the further development of the Safety Culture Framework:

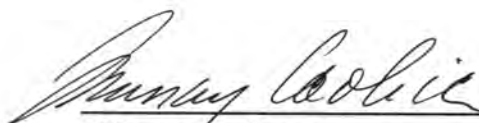
- What role will the Offshore Boards play in promoting and enforcing this framework?
- What role, if any, will the Offshore Boards play in developing and supporting safety training within the industry?
- Has the National Energy Board considered the inclusion of onshore production facilities as needing the same safety culture framework?
- For the National Energy Board, will this encompass gas distribution systems as defined in the oil and gas pipeline system safety standard (CSAZ662)?

In closing, the Province of Nova Scotia commends the Offshore Boards for their work to improve the safety culture in the Offshore industry. We appreciate the opportunity to provide feedback on the Draft Framework. It is our hope that this work will continue and affect real safety cultural changes within the Offshore industry.

Sincerely,



Sandra A. McKenzie
Deputy Minister
Department of Labour and Advanced Education



Murray Coolican
Deputy Minister
Department of Energy

c: Stuart Pink, CEO, CNSOPB