

ConocoPhillips Canada

1600, 401 - 9th Avenue S.W.
P.O. Box 130, Station "M"
Calgary, Alberta T2P 2H7
(403) 233-4000

January 30, 2014

Safety Culture Consultation
National Energy Board
444 Seventh Avenue SW
Calgary AB T2P 0X8

Attention: Claudine Bradley

Re: Draft Safety Culture Definition and Framework

Dear Ms. Bradley,

ConocoPhillips Canada (CPC) appreciates the opportunity to provide feedback on the draft Safety Culture Definition and Framework proposed by the National Energy Board (NEB), the Canada Nova Scotia Offshore Petroleum Board, and the Canada-Newfoundland and Labrador Offshore Petroleum Board.

CPC agrees that a robust, positive Safety culture is essential to protect workers, the public and the environment and CPC and the broader oil and gas industry have been actively working on developing a strong safety culture for many years.

CPC believes that Safety culture is driven by leadership. Leadership drives Safety culture by:

- Setting expectations
- Ensuring adequate planning
- Executing plans
- Verifying expectations are being met

Effective systems combined with organizational learning and mindfulness enables an organization to be continuously alert to potential failures. Barriers can then be implemented to prevent potential incidents. CPC believes in building a learning organization and would recommend the term "learning" rather than "vigilance" in the draft safety culture framework. Our belief is that learning enables the improvement of the organization. Organizations need to ask *how* an incident occurred, to be able to learn how to improve the organization rather than asking *why* an incident occurred, which focuses on improving workers and prevents an in-depth understanding of the incident.

An organization's leadership must have the ability to drive safety culture in a manner that reflects their values and beliefs. An attempt to regulate safety culture will prevent organizations from implementing the most effective tools, philosophies, and expectations to drive their organizational culture and would dilute the overall ability for organizations to achieve safety goals. The existing safety regulations effectively regulate the outcomes of an organizations safety culture (eg. implementation of a management system) while enabling organizations to build an effective safety culture that is embedded into their overall organizational culture.

CPC supports the NEB's efforts to share knowledge and generate discussion on understanding safety culture. The difficulty at this time is that there is no way to consistently measure safety culture. This is the major obstacle to trying to drive improved safety performance through regulatory mechanisms. CPC suggests ongoing dialogue and sharing of best practices needs to occur to achieve the mutual industry and regulatory goal of improving safety performance.

CPC welcomes the opportunity to collaborate with the regulators on the topic of safety culture and the importance of organizational learning.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darryl Hass', written in a cursive style.

Darryl Hass, P. Eng.
Vice President,
Health, Safety, Environment Operations
ConocoPhillips Canada