

January 30th, 2014

Claudine Bradley
National Energy Board
444-7th Avenue S.W.
Calgary, AB T2P 0X8

Dear Ms. Bradley:

Re: Advancing Safety in the Oil & Gas Industry; Draft NEB Safety Culture Framework

The Canadian Gas Association (CGA) has been asked to comment on the National Energy Board's Draft Safety Culture Framework on behalf of its natural gas distribution & transmission members. In submitting our input we first want to commend the NEB for its unwavering commitment to & leadership role in the areas of public & worker safety in Canada.

The CGA & its members are committed to the safe, reliable & resilient supply of natural gas to over 6.5 million energy consumers in Canada & we believe this work by the NEB on a framework for safety culture aligns extremely well with our ongoing industry safety initiatives as well as our members own efforts to advance safety culture within their organizations. We are particularly happy that the NEB has at this time approached this important topic from a perspective of full transparency & consultancy.

We found the framework as presented to be logical & well laid out & we particularly agree with the overall statement "Safety includes safety of workers & the public, process safety, operational safety, facility integrity, security & environmental protection".

The structuring of the draft framework around the four negative & specifically the four positive dimensions, including particularly the detail that defines how to begin addressing each, is very effective & well thought out.

Under the section talking about "A strong safety culture is one in which..." there are some statements that could be considered for different wording:

- Every employee feels empowered and rewarded for making safe decisions; perhaps the use of the word recognized could be substituted for the word rewarded. Rewarded can quite often mean something else.
- The supervisor does not have to be present for someone to do the right thing; we have tended to ensure all statements of this nature relate to all stakeholders so perhaps something more along the lines of "Every worker (or member of the workforce) is consistently doing all the right things regardless of whether or not anyone else is present or watching".

As the development of this framework progresses, we think this is an excellent starting point in an equal partners' dialogue between operational & financial regulators & industry that can produce a consistent national approach to safety culture across Canada.

We feel there could be some value in engaging a third party to bring the various stakeholders together to drive alignment & agreement leading to a truly national approach & we believe it would be just as important to have another full consultation period when the framework is in or close to its final form. Ongoing open dialogue & another full consultation period would allow natural gas delivery industry members to fully understand & prepare for the expectations that could be placed on their organizations. As such there is also great interest in knowing any associated completion & implementation timelines.

Going forward, we would like to understand if there has been any thought about building an audit system based on this framework, for the verification of the effectiveness of safety culture within any given organization. As you know this was one of the recommendations in the August 2013 Senate Standing Committee on Energy, the Environment & Natural Resources report **Moving Energy Safely: A Study of the Safe Transport of Hydrocarbons by Pipelines, Tankers and Railcars in Canada**. If so we would suggest any such work again allow for an equal partners dialogue including the possible inclusion of a dispute resolution mechanism. Needless to say we would also very much appreciate the opportunity to be involved in & comment on this work should it be initiated.

And again thank you for the opportunity to comment & we encourage the NEB to continue its efforts in this important work protecting the safety of the public & all workers in Canada.

Yours truly,



Jim Tweedie

Director, Operations, Safety & Integrity Management, Canadian Gas Association
(On behalf of the natural gas distribution & transmission company members of the CGA)

cc: CGA Standing Committee on Operations