



Alliance Pipeline Ltd.  
800, 605 – 5 Avenue SW  
Calgary, AB, Canada  
T2P 3H5

Telephone (403) 266-4644  
Toll-free 1-800-717-9017  
Fax (403) 266-4495

Sent Via Email (to [safetyculture@neb-one.gc.ca](mailto:safetyculture@neb-one.gc.ca))  
Signed Original Hand Delivered to NEB's Mail Room

January 30, 2014

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

Dear Ms. Bradley:

**Re: Draft Safety Culture Definition and Framework  
Comments on Discussion Paper Released October 31, 2013**

Alliance is taking this opportunity to comment on the discussion paper that the Board released on October 31, 2013 entitled "Advancing Safety in the Oil and Gas Industry: Draft Safety Culture Framework".

Alliance is a member of the Canadian Energy Pipeline Association and supports the written comments that have recently been filed by CEPA in relation to this matter.

Alliance shares CEPA's view that the draft framework provides a good representation of the evolving science of safety culture. It is further noted that the framework aligns with the general consensus of what the pipeline industry regards as common dimensions and desired attributes. As CEPA has correctly observed, however, there is no specific wording to gauge the Board's expectations.

Particularly as such, Alliance supports CEPA's central recommendation that a comprehensive stakeholder review process be established so as to ensure that parties have a consistent and clear understanding of the Board's expectations going forward. At the same time, this will help ensure that the operational experience and expertise of pipeline companies is taken into account, thereby further promoting best outcomes.

At this time, Alliance has the following additional specific comments and suggestions to offer on the promotion of positive safety cultures:

- ❖ *Safety Workshops* – Alliance commends the Board on the success of its 2013 Safety Forum, and would encourage the Board to promote further two-way dialogue of this type. In this connection, Alliance would encourage the Board to sponsor or otherwise promote further safety workshops for company leaders and field supervisors.
- ❖ *Setting of Consistent Criteria* – Alliance would encourage the Board and other regulators to develop consistent criteria and indicators, including in the areas of incident reporting and the recording of injuries. With respect to this latter item, Alliance notes that the most common industry measure is Recordable Injury Frequency. While this might appear to be a consistent measure throughout industry, there is room for interpretation as to what constitutes a "recordable" injury. Harmonization across jurisdictions and regulators should therefore be promoted for purposes of consistency and comparison.

.../2

- ❖ *Evaluation Process* – The evaluation process for effective safety cultures requires both clarity and consistency. Towards that end, the draft discussion paper provides a solid starting point and a basis for further dialogue.
- ❖ *Leading Indicators* – To foster a proactive safety approach, Alliance suggests that regulatory authorities focus more of their measures on leading indicators.
- ❖ *Positive Recognition* – As part of a balanced compliance and feedback program, Alliance would encourage regulators to give positive recognition to companies who are taking steps to improve.

Alliance wishes to thank the Board for the opportunity to comment on this important topic, and looks forward to engaging in next steps on this initiative.

In closing, should the Board have any questions relating to this submission, please don't hesitate to contact the undersigned.

Sincerely,

*[Original Signed]*

Rob Power  
Regulatory Coordinator, Canadian Applications & Compliance  
Telephone: 403-517-7740; Fax: 403-233-0735  
E-mail: [rob.power@alliancepipeline.com](mailto:rob.power@alliancepipeline.com)