



Safety Culture Consultation
Attention: Claudine Bradley
National Energy Board
444 Seventh Avenue SW
Calgary, Alberta
T2P 0X8

30 January 2014

RE: Advancing Safety in the Oil and Gas Industry: Draft Safety Culture Framework

The Maritimes Energy Association congratulates the offshore regulatory Boards for the initiative to prepare this draft Safety Culture Framework. The promotion of safe operations, in any industry, requires a multi-faceted approach. While company rules and programs are one component, it is important that organizations are promoting an internal culture of safety; promoting the minimization of risk to both employees and the environment. Health and safety plans cannot simply be paid lip service, but instead companies must invest in creating a culture of minimizing risk and injury.

Our association represents hundreds of member companies that are contracted to operators and producers regulated by the three offshore regulatory Boards; the Canada - Nova Scotia Offshore Petroleum Board (CNSOPB), the Canada - Newfoundland & Labrador Offshore Petroleum Board (C-NLOPB) and the National Energy Board (NEB). So this Safety Culture Framework is of particular importance and significance to our member companies. It provides the framework by which they need to measure not only the work they do for operators and producers offshore, but also their conduct in their own workplace onshore.

While there are operators and producers that are members of The Maritimes Energy Association, we are an independent, not for profit industry association that chiefly represents the businesses that provide goods and services to the energy industry in eastern Canada – offshore & onshore, renewable & non-renewable.

Our core membership primarily consists of local businesses that are part of the supply chain and employ thousands of people, injecting millions of dollars into our local economy.

Over the past decades our member companies have learned from the energy industry that safety is the top priority. To work successfully in the industry, companies must

embrace that mantra. It is not simply about having a safety plan on a shelf in the office, but having a culture of safety that permeates the business.

Our members recognize the importance of safety, of a safe work place, whether that is onshore or offshore. The Maritimes Energy Association has long recognized the importance of encouraging a safety culture throughout the industry and regularly hosts sessions on the topic. We were pleased to host Dr. Mark Fleming of Saint Mary's University at our annual *Core Energy Conference* in October of 2013 to provide a presentation to delegates titled "Safety – Job One: Measuring Safety Culture".

The Maritimes Energy Association supports the offshore regulatory regime represented by the CNSOPB, the C-NLOPB, and the NEB, as well as the onshore regulations in the Maritime Provinces that promote safe operations for workers and the environment. We welcome the draft Safety Culture Framework as it provides guidance to identify, capture and sustain the culture of safety in the workplace.

The proposed draft safety culture definition is aligned with how we define the term "safety culture". It is not simply about having rules in place but promoting norms, attitudes and beliefs with respect to risk and safety.

A company can have a comprehensive health and safety program, but that is not the same as valuing and actively promoting safe operations. This campaign of safety should have internal mechanisms in place that protect against threats to the established safety culture, including workplace climate surveys to monitor the current state of the organization's safety culture.

It is important that safety culture is not simply regarded as something only applicable to those working on a rig or offshore vessel. A safety culture should be promoted throughout all levels of the organization, and there must be leadership to show the organization's dedication to it.

In December, 2013, The Maritimes Energy Association presented to The House of Commons Committee on Natural Resources in support of Bill C-5, the Offshore Health & Safety Act. The bill clarifies some of the responsibilities regarding offshore operations and formalizes certain worker rights such as the right of a worker to refuse work they believe constitutes a danger to themselves or others, and protects them from retaliation. The right to refuse work has already been ingrained in many companies throughout the industry due to the importance placed on safe work through an

established safety culture. The legislation formalizes many of the best practices widely in use throughout the industry.

The discussion paper provides a definition and framework that is beneficial in promoting a shared understanding of what a culture of safety is and how it should be cultivated. The framework included presents a good overview of the positive dimensions that should be included in a safety culture and the threats that should be guarded against. We encourage continued discussions that revolve around the promotion of a safe work environment in the industry. The released definition and safety culture framework do an effective job explaining a safety culture, how to promote it and how to identify it.

We appreciate the work of the NEB, the C-NLOPB, and the CNSOPB in the creation of this document and for promoting effective safety cultures throughout the industry. While there are risks associated with any type of work and activities, ensuring an effective safety culture minimizes the risk of injury to workers and harm to the environment.

The Maritimes Energy Association supports continued discussions around safety culture and measures to reduce risk throughout the industry.

Thank you for this opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sean Joudry', with a stylized, cursive script.

Sean Joudry
Policy Analyst
The Maritimes Energy Association