



Lloyd's
Register

Stage 2 - SS1

Interim report for:

The Dow Chemical Company

LR reference:	UQA4000037 / 3422902
Assessment dates:	16-November-2020 - 19-November-2020
Reporting date:	22-November-2020
Client address:	2030 Dow Center, Midland MI 48674,US
Assessment criteria:	RCMS-Option #2
Assessment team:	Phil Nalasco
LR Client Facing Office:	UQA USA OU

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Attachments:

UQA4000037_APP_ST2_RCMS_PN_DOW WH_.doc

This report was presented to and accepted by:

Name: Courtenay Boyda

Job title: Dow Canada RC Code Coordinator

Assessment of: Additional CIAC Elements Review	Auditee(s): Courtenay Boyda, Andreea Mihele, Adrienne Lovric, Jess MacDonald, Randy Mak,	Assessor: Phil Nalasco
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Audit trails and sources of evidence:

Memorandum of Understanding between CIAC and ACC [1709 RC Verification MOU EN]
List of CIAC Additional Canadian Elements for RCMS Audits [Additional Elements for ACC Audit].

Reviewed CIAC Additional Elements When Conducting RCMS audit.

1. Evidence of participation in TRANSCAER® activities by the company where it has operations.
Interview with Randy Mak, National TRANSCAER chair. Shared meeting minutes from last Prairie Region TRANSCAER meeting.
2. Evidence of the development and communication of a worst-case scenario and other community engagement requirements,
Reviewed that worst case scenarios under the new Canadian Environmental and Protection Act, Environmental Emergencies regulation. Discussed the E2 Plans for AN, Styrene, and Aqueous Ammonia. Reviewed the AN release plan. Newsletter distributed "Safety information for you and your family, West Hill Site, dowcanada.com" August 2020 everyone in approximately a 1 km radius of the WH site. This newsletter included site safety, prevent, prepare and respond, alarms on-site, Responsible Care, Informing You, Community Siren Test, Safety at home and Sheltering in place. WH procedure #02-EN-085.
3. Evidence of participation by company leadership in CIAC Responsible Care activities and committees, and submission of the annual Responsible Care recommitment letter,
Reviewed the CIAC Dow Canada's annual RC recommitment letters for 2019 and 2020 endorsed by Dow Canada President. Reviewed list of Dow personnel in CIAC committees. Dow demonstrated leadership participation by top management in the following committees: executive, board, business and economics, and regional leadership groups. Viewed Document: CIAC Dow Canada List_September 2020 that included the WH site leader.
4. Evidence the company has provided CIAC with benchmarking data and other required data submissions including subcontractor evaluation requirements,
Reviewed what benchmarking data Dow provides to CIAC. Dow participates in the National Environmental Quality Committee (Dow members: Courtenay Boyda, Andreea Mihele and Stephanie Kozey). As part of this effort, Dow submits NERM data with NPRI data. Also, as requested, Dow also provides process safety and personal safety data to CIAC PRIM and SHARE committees. Reviewed WH NERM submission dates.
5. Evidence the company has reviewed its activities against CIAC's Responsible Care Ethic and Principles and its position on sustainability and corporate responsibility.

Reviewed CIAC Responsible Care code gap assessments where each Responsible Care code is cross referenced with a Dow ODMS element with evidence as to how Dow Canada meets that requirement. OPERATIONS – Cross Reference of ODMS to RC Requirements – 2019 Update.xlsx. Reviewed Dow Canada 2020 Public Affairs Strategy outlining targets for supporting Dow as a leader in Responsible Care and Sustainability. Reviewed the Responsible Care – Canada Public Affairs Communications Output spreadsheet with Task Name, Bucket Name (Social Media, Dow Connect, etc.), and description of the task. Document: Responsible Care – Canada Public Affairs Communications Out-put.xlsx.

6. Evidence of stakeholder/community dialogue, including interviews by auditors with local community representatives,

Video interview with Nadia Heyd, Scarborough Storefront and CAP member, on Wednesday, November 18/20. Reviewed the March 2020 CAP meeting minutes. CAP member confirmed well attended and effective meetings.

7. Evidence of engagement with indigenous communities near production facility with respect for their unique history, culture and rights. Adrienne Lovric reviewed Dow Canada Indigenous Network Community Engagement Tracker. Highlighted the following Ontario initiatives: Horizon School Kit delivery; INDSPIRE Scholarship is a Toronto based scholarship. Covid19 pandemic restrictions have delayed some of the programs implementation.

8. Evidence that the company promotes Responsible Care by name and employees are aware of the term. Reviewed the Responsible Care – Canada Public Affairs Communications Out-put spreadsheet with Task Name, Bucket Name (Social Media, Dow Connect, etc.), and description of the task. Each week, the Dow Canada Public Affairs team reviews the content. Reviewed Responsible Care posts on social media. Examples of posts were employees at RC training, TRANSCAER messaging and participation, emergency drills, safety messages. Reviewed iCare video series with #ResponsibleCare. RC Video showed to employees at West Hill site.

Evaluation and conclusions:

Evidence provided and reviewed confirmed that Dow corporate and WH management have implemented the additional CIAC elements required to maintain conformance with Dow Canada membership in the CIAC.

Areas for attention:

None