



# RESPONSIBLE CARE<sup>®</sup> Verification Report

*INEOS Canada Partnership*

May 5, 2015



Chemistry Industry  
Association of Canada



Responsible Care<sup>®</sup>  
Our commitment to sustainability.

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# EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of INEOS Canada Partnership. The verification was undertaken on May 05 & June 22/23, 2015 and included a team visit to the Joffre, Alberta facility. The team also met with representatives of the site's community advisory panel referred to as JCAP. This was the fifth Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on April 03 & 04, 2012

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The verification is complete and no further involvement is required by the verification team.



August 05, 2015

Dave Mack  
Verification Team Leader

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

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## SUMMARY OF VERIFICATION TEAM OBSERVATIONS

### Works in Progress

The following relate to self-initiated actions in support of continual performance improvement.

- i. The next plant-wide hazard and operability study revalidation due to commence in 2015.
- ii. Completing the defined preventive maintenance program for critical instrumentation. (Note: Currently 80% complete.)
- iii. Moving from one annual transportation emergency exercise to doing this twice per year.
- iv. In process of upgrading product rail cars from DOT 111 to DOT 117 per new regulations.
- v. Currently implementing a new contractor evaluation and selection process to enhance that currently existing (i.e., ISN process).
- vi. Collaborating with those responsible for the INEOS Oligomers web site, to insert the annual Joffre LAO Plant Responsible Care Statement therein.

### Improvement Opportunities

The following relate to suggested actions that would enhance the effectiveness of current programs.

- i. With respect to monitoring rail road Responsible Care performance, meet with and discuss the outcomes of and follow up to their Responsible Care certification reports.
- ii. Review the current process for communication of worst case incident scenario and what to do in an emergency to potentially impacted site neighbours, to ensure that this is consistently done on a defined frequency and is understood.
- iii. Encourage JCAP to establish an internal process for clearly identifying and listing issues and also what they want to know about in general, including a means to follow-up and establish closure.
- iv. Include local municipal officials and emergency planning authority in the distribution of this and future Responsible Care verifications reports.

### Successful Practices

The following relate to actions that strongly support sustained excellence in performance.

- i. The defined means within the management of change process to determine the appropriate process hazard assessment methodology and depth of analysis to be applied.
- ii. The assignment of a dedicated management of change coordinator to focus on the initiation of the change management process where changes are identified.
- iii. The development of pre-plans that address special considerations, what can help and what can hurt for potential incident scenarios to facilitate effective emergency response.
- iv. The use of databases (e.g., operating envelope safe operating limits, hazard and operability studies, etc.) to assist in effectively managing a safe and environmentally responsible operation.
- v. The overall objective setting process (Performance Contract), Responsible Care scorecard and individual performance tracking system (Relay).
- vi. What is referred to as Traction Golden Rules, which ensure understanding and acceptance of the expectations of those assigned to audit, incident review, etc. action item follow-up and closure.

## 1. INTRODUCTION

### 1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for INEOS Canada Partnership operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

#### *The Responsible Care® Ethic and Principles for Sustainability*

*We are committed to do the right thing, and be seen to do the right thing.*

*We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:*

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care, INEOS Canada Partnership must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is generally conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel) and
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website [www.canadianchemistry.ca](http://www.canadianchemistry.ca). INEOS Canada Partnership is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website [www.canadianchemistry.ca](http://www.canadianchemistry.ca), or by CIAC at [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) or (613) 237-6215 extension 233.

### 1.2 About INEOS

INEOS is a global manufacturer of petrochemicals, specialty chemicals and oil products. With global headquarters in Texas, USA, the INEOS Oligomers business produces a comprehensive range of specialty and intermediate chemicals derived from ethylene and butene. The Joffre, Alberta facility produces Linear Alpha Olefins, and is located adjacent to a NOVA Chemicals petrochemical complex, which provides it with various utilities and services. The company’s products are used in the production of polyethylene, as intermediates for the manufacture of linear plasticizers for polyvinyl chloride, as raw material to manufacture polyalpha olefins for synthetic lubricants, as a building block for the production of biodegradable surfactants and for a host of other intermediate and final products.

### 1.3 About This Verification

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of INEOS Canada Partnership. The verification was undertaken on May 05 & June 22/23, 2015 and included a team visit to the Joffre, Alberta facility. The team also met with representatives of the site’s community advisory panel referred to as JCAP. Attachment 2 contains a list of those individuals interviewed and their affiliations. This was the fifth Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on April 03 & 04, 2012

The verification team was comprised of the following individuals.

<b>Name</b>	<b>Affiliation</b>	<b>Representing</b>
Dave Mack	Consultant	<i>Team Leader</i>
Rejeanne Cool (part time)	Consultant	<i>Industry verifier</i>
Mike Forsyth	JCAP Member	<i>Community Representative</i>

## 2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

During the verification of INEOS Canada Partnership the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Works in Progress;** document instances where the team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement opportunities.
2. **Successful Practices;** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
3. **Improvement opportunities;** identify instances where the team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further

improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

## 2.1 Team Observations Concerning Operations Code

The Operations Code defines environment, health and safety expectations regarding all company operational aspects including product manufacturing, transportation and distribution.

### 2.1.1 Design and Construction of Facilities and Equipment

There is a project execution process in place that addresses aspects of project management, including engineering, procurement, construction, turnover and close out. This is supported by a management of change process designed to ensure that no unacceptable risks are introduced into the operation when changes are made to such things as chemicals, technology, equipment, procedures and people. Process hazard assessments are applied to all changes.

#### **Successful Practices**

- i. The defined means within the management of change process to determine the appropriate process hazard assessment methodology and depth of analysis to be applied.
- ii. The assignment of a dedicated management of change coordinator to focus on the initiation of the change management process where changes are identified.

### 2.1.2 Operations Activities

In order to regularly assess the rigour of controls for on-going safe and environmentally responsible operations, every 5 years a hazard and operability study is done on the entire manufacturing operations envelope. This is referred to as a five year revalidation. In addition, emergency operating procedures are on an annual review cycle with other procedures, including maintenance, on a three year cycle. Laboratory operations include product quality control and analytical activities. The on-site laboratory is operated by a contracted service provider that is certified by the International Organization for Standardization quality standard. Laboratory quality control and assurance plans are in place. All of the products manufactured at the site are shipped by tank car using a major national railroad operator and Responsible Care partner. Any cross border handovers are done with United States Responsible Care partners. There is some short line railroad handover in the United States. Defined specifications are in place for the rail cars, which are either owned or leased. A contracted service provider carries out the inspection and maintenance on company owned equipment with the leasor providing the same on leased equipment. For manufacturing operations, critical instrument, electrical, mechanical and pressure containing equipment have been defined. Preventive maintenance and inspection programs are in place or under development. A risk based system focusing on criticality, referred to as Ranking Index for Maintenance Expenditures, is used to determine the priority for the execution of equipment repairs, and breaking down the work into essential, high and medium priorities.

#### **Works in Progress**

- i. The next plant-wide hazard and operability study revalidation due to commence in 2015.
- ii. Completing the defined preventive maintenance program for critical instrumentation. (Note: Currently 80% complete.)

#### **Improvement Opportunities**

- i. With respect to monitoring rail road Responsible Care performance, meet with and discuss the outcomes of and follow up to their Responsible Care certification reports.

### 2.1.3 Safety and Security

Corporation wide, there are ten behavioural (occupational health and safety) and ten process safety principles in place to which each site is expected to conform. In the area of occupational health and safety, a pre-task hazard assessment is carried out prior to commencing work on facilities and equipment and this is integrated into a defined work permit system. Similar assessments are also built into operating procedures. A full job hazard assessment is done for non-routine work (e.g., turnaround). There is an industrial hygiene program in place covering manufacturing and laboratory activities. This includes job exposure profiles, which are used to determine health surveillance, personal exposure monitoring, personal protective equipment requirements and the like. Baseline medical examinations are carried out for all new employees. This is repeated every two years for potentially exposed individuals. It is voluntary for all others. Occupational health and safety work procedures are defined. A contractor health & safety program is also in place. In the area of process safety, the previously mentioned five year hazard and operability study revalidation is used to regularly assess hazard potential, and a worst case incident scenario has been defined. An operating envelope has been established which defines safe operating limits for the manufacturing operation. Any excursions are reported, investigated and tracked. The standard used for process safety is the United States process safety regulation, and a defined site specific process safety management program is in place. On-site emergency response is coordinated through the NOVA Chemicals' multi-unit operation, with the INEOS facility being considered as a unit within the overall plan for Joffre (i.e., one site-one plan approach). There is a site specific plan in place for the INEOS unit. Operating technicians function as first responders, supported by specialized personnel and equipment from NOVA. Three emergency drills are held annually by each operating team. INEOS is an active member of the local mutual aid group referred to as the Lacombe County Mutual Aid Organization. Every three years, there is a major mutual aid exercise carried out based upon a community impact scenario. There is also a transportation emergency plan in place, which addresses such things the provision of technical advice and equipment in support of local incident responding agencies throughout the transportation corridor. Specialized contractors assist with on scene equipment and expertise. One transportation emergency exercise is carried out annually. With regard to site security, all recommendations from a vulnerability assessment have been implemented and a security plan is in place. The site is fenced with security cameras in place as well as access controls. Regular physical monitoring around the fence line is conducted. Contingency plans are in place for various threat levels. There is also a transportation security policy in place, which includes requirements for access control to loading areas and in transit individual rail car sealing and manifesting. Typical potential critical infrastructure and site business continuity impacts have been considered and an off-site location has been established where site business can be managed if required.

#### Works in Progress

- i. Moving from one annual transportation emergency exercise to doing this twice per year.
- ii. In process of upgrading product rail cars from DOT 111 to DOT 117 per new regulations.

#### Successful Practices

- i. The development of pre-plans that address special considerations, what can help and what can hurt for potential incident scenarios to facilitate effective response.
- ii. The use of databases (e.g., operating envelope safe operating limits, hazard and operability studies, etc.) to assist in effectively managing a safe and environmentally responsible operation.

### 2.1.4 Environmental Protection

There is an environmental management system in place, which is registered and conforms to the International Organization for Standardization Environmental Management Systems standard (ISO 14001). Emissions to air and water effluent are known and quantified. There are no toxic emissions from the site. There is a greenhouse gas quantification and water release guide in place. Water supply and ultimate release is managed through the NOVA Chemicals facilities. Organic wastes go to a fuel blending facility, with other materials either being destroyed or land filled. An approved service provider is contracted to manage manufacturing operations and

laboratory waste handling, transport and disposal operations. There are no specific emissions or waste reduction metrics in place, however this is addressed through activity based objectives.

#### **2.1.5 Resource Conservation**

Conservation of resources is addressed through operational controls on the consumption of feedstock, catalyst, electricity, steam and natural gas. Water is recycled to the extent possible. There are no specific resource conservation metrics in place, however this is monitored and addressed through activity based objectives.

#### **2.1.6 Promotion of Responsible Care by Name**

All employees have gone through the CIAC on-line Responsible Care training program, and it was evident that the initiative is well understood. The logo is displayed on letter head and business cards, and throughout the facility. The Responsible Care commitment is posted at the entry to the building. Environment, health and safety related performance results are reported under the umbrella of Responsible Care. There is also an annual report for external distribution entitled Joffre LAO Plant – Responsible Care Statement.

### **2.2 Team Observations Concerning Stewardship Code**

The Stewardship Code addresses all company raw materials, products and services and defines expectations for the care and control of same throughout their life cycle.

#### **2.2.1 Expectations of Companies**

Although there is no core research and development work done by the Joffre facility, there is some work being done to investigate the use of existing site products in new market applications, which may include product modification. Any manufacturing process changes are managed through the previously mentioned management of change process. Liaison has been established with the corporation's product chemistry expertise to address the development of any new product risk management information that may be required. The corporation's product stewardship group maintains material safety data sheets for Joffre products and provides consulting services to customers regarding any existing product risks. Reviews of existing product risk information is ongoing with data being gleaned from industry consortiums. As the site is relatively new there are no historical waste management practices of concern.

#### **2.2.2 Expectations with Respect to Other Parties**

Other parties include product exchange partners, product transloading terminals, suppliers, contractors, contract laboratories and customers. Product exchanges occur with only one other company, which also attests to Responsible Care in the United States. There are processes in place that include for Responsible Care related expectations with respect to the selection and performance monitoring of terminals, chemical suppliers, contractors and contract laboratories. A system referred to as Red Pack contains all relevant information related to contractors. Customers are mainly large chemical processing organizations, which also attest to Responsible Care. Audits are sometimes done on new customers' sites prior to product delivery. Responsible Care related expectations are included in contracts. Contracts are typically on an annual renewal basis at which time Responsible Care aspects are re-addressed.

#### **Work in Progress**

- i. Currently implementing a new contractor evaluation and selection process to enhance that currently existing (i.e., ISN process).

### **2.3 Team Observations Concerning Accountability Code**

The Accountability Code defines expectations for communication and dialogue with communities local to company manufacturing and distribution operations and transportation corridors, as well as other stakeholders with an interest in company activities.

### 2.3.1 Operating Site Communities

Community outreach is integrated with NOVA Chemicals (i.e., one site-one plan approach). The local community is defined as those residing or operating within a five kilometre radius of the plant. This is based upon NOVA's potential worst case scenario off-site impact. There is a community advisory panel, referred to as JCAP, with a defined charter in place that includes representation from those within the 5 kilometre radius. The previously mentioned Responsible Care Statement document is available to the community. Social responsibility at the site is defined as a commitment to carry out business in a socially responsible manner consistent with corporate values. This includes volunteering to local organizations as suggested by the employees, and also providing funding to selected charities. There is a documented charitable volunteer policy in place.

#### Work in Progress

- i. Collaborating with those responsible for the INEOS Oligomers web site, to insert the annual Joffre LAO Plant Responsible Care Statement therein.

#### Improvement opportunities

- i. Review the current process for communication of worst case incident scenario and what to do in an emergency to potentially impacted site neighbours, to ensure that this is consistently done on a defined frequency and is understood.
- ii. Encourage JCAP to establish an internal process for clearly identifying and listing issues and also what they want to know about in general, including a means to follow-up and establish closure.

### 2.3.2 Other Stakeholders

Interface with government officials, at appropriate levels, occurs on an as needed basis. This may also apply on occasion to other potential stakeholders. There is a business ethics code of conduct in place that all employees are required to review every three years. The site has been involved in the TransCAER initiative since start up, and actively participates in the CIAC prairie regional committee and events.

## 3. TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments. The verification team studied the INEOS Canada Partnership management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide. The verification team's related observations to the company management system(s) are as follows:

### 3.1 Overall System Structure

The overall structure is intended to address how the company's Responsible Care related management system and its components align with the plan-do-check-act continual performance improvement process. This includes how Responsible Care Code expectations are cross referenced to relevant management system elements and/or supporting standards, processes and procedures.

There is a documented overall thirteen element Responsible Care related management system in place, which is referred to as the Joffre Management System, and links in general to the Responsible Care code requirements. All sub-elements have been specifically linked to the Responsible Care code elements in a cross reference spreadsheet.

### 3.2 Observations on the PLAN Step

During the PLAN Step of the management system, the company decides what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

Site objectives, which include Responsible Care aspects in the form of a specific scorecard, are established annually using inward and outward looking historical data, anticipated expectations, etc. These objectives are documented in a format referred to as the Performance Contract. Team and individual objectives flow from these overall objectives.

#### **Successful Practice**

- i. The overall objective setting process (Performance Contract), Responsible Care scorecard and individual performance tracking system (Relay).

### 3.3 Observations on the DO Step

During the Do Step in the management system, the company converts the decisions of the PLAN Step into action and ensures awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

All employees are accountable for Responsible Care related implementation at the site, within their sphere of influence. Subject matter expertise is available to assist. Employees are trained in Responsible Care related activities for such things as safe work practices, process safety awareness, environmental protection, emergency response, incident investigation, etc. There are a number of documented processes and procedures in place which include project execution, management of change, plant operations, maintenance, occupational health & safety, process safety, contractor safety, environmental management, site/transportation emergency response & security, etc.

### 3.4 Observations on the CHECK Step

During the CHECK Step in the management system, actions carried out in the DO Step are assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components will be reviewed along with employee competences for assigned responsibilities, internal and external audits will be undertaken, incidents will be assessed to identify root causes, and performance measurement will be conducted and reviewed.

Performance against overall objectives is routinely tracked and actions are taken as required to address deficiencies. There is a range of audits, which regularly take place. These include occupational health and safety audits every three years based on the previously mentioned ten behavioral principles, process safety audits every three years based upon the previously mentioned ten process safety principles, environmental and quality management system audits three times per year, overall management system audits every three years, and insurance audits every 2 years. There is also a routine site inspection program in place. There is a documented incident reporting and investigation process in place, which addresses incident review, identification of root cause and actions to be taken to prevent recurrence.

### 3.5 Observations on the ACT Step

During the ACT Step in the management system, the company translates the results of the CHECK Step into corrective actions for improvement. This includes revisiting the PLAN Step to decide whether changes are need

to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the ACT Step include whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded or corrected, etc.

As previously mentioned, performance against objectives is routinely tracked to ensure conformance, and overall objectives are revisited annually. Action items from audits, incident reviews and the like are recorded in a system referred to as Traction. This system records the details, the actions to be taken, the individuals assigned to address the action, and a follow-up process to ensure that actions are taking place and being closed out in timely manner when correctly addressed. Individual performance versus objectives is tracked through a process referred to as Relay. There is an employee bonus system in place based upon overall performance results.

#### **Successful Practice**

- i. What is referred to as Traction Golden Rules, which ensure understanding and acceptance of the expectations of those assigned to audit, incident review, etc. action item follow-up and closure.

#### **Improvement opportunity**

- i. Include local municipal officials and emergency planning authority in the distribution of this and future Responsible Care verifications reports.

## **4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY**

Each CIAC member company is formally committed to the ethic of "*Doing the right thing, and being seen to do the right thing.*" This ethic, along with the principles for sustainability is expected to guide the company's decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business. The verification team carefully observed the INEOS Canada Partnership decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible Care Ethic and Principles for Sustainability as discussed in the Responsible Care Commitments (Appendix E). The verification team's related observations on the company's application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

Through observation and analysis, the company was seen to be appropriately aligned with following elements of the *Responsible Care Ethic and Principles for Sustainability*:

- *Work for the improvement of people's lives and the environment, while striving to do no harm.*
- *Be accountable and responsive to the public especially our local communities, who have the right to know the risks and benefits of what we do.*
- *Take preventive action to protect health and the environment.*
- *Innovate for safer products and processes that conserve resources and provide enhanced value.*
- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*
- *Understand and meet expectations for social responsibility.*
- *Work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirement and meet or exceed their letter and spirit.*
- *Promote awareness of Responsible Care, and inspire others to commit to the principles.*

## 5. VERIFICATION TEAM CONCLUSION

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the range of Findings Requiring Action identified during the verification, as summarized in the Executive Summary and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

## COMPANY RESPONSE TO VERIFICATION TEAM REPORT

On behalf of INEOS Canada Partnership I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team. INEOS Canada Partnership will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating sites. We will give consideration to the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to those Works in Progress where completion of such is action required to close gaps with respect to requirements, as identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and communicated to the verification team at the time of our next verification.

Barry MacKenzie  
Site Director  
INEOS Canada Partnership  
August 4, 2015

## INTERVIEW LISTS

## A: Company Personnel

Name	Position	Location
Andy Nokes	Project Engineer	Joffre, Alberta
Barry MacKenzie	Site Director	Joffre, Alberta
Barry Miller	Maintenance Engineering Manager	Joffre, Alberta
Brad Campbell	Process Engineering Lead	Joffre, Alberta
Bruce Doll	E&I Specialist	Joffre, Alberta
Christina Dupstadt	SHEQ Advisor	Marina View, Texas
Chuck Obst	Environmental/Quality Specialist	Joffre, Alberta
Erik Shields	SHE Coordinator	Joffre, Alberta
Fiona Hess	Process Chemist	Joffre, Alberta
Gary Cole	Finance Manager	Joffre, Alberta
Gordon Schiller	Logistics Supervisor	Joffre, Alberta
Jeff Beztilny	Operations Manager	Joffre, Alberta
John Dokter	Operations Engineer	Joffre, Alberta
John Mulgrew	HR/SHE Manager	Joffre, Alberta
Kevin Ratliff	Market Manager	Marina View, Texas
Mohammed Zakaria	Process Engineer	Joffre, Alberta
Reg Steele	Operations Maintenance Coordinator	Joffre, Alberta
Rick Plante	Mechanical Maintenance Supervisor	Joffre, Alberta
Scott Soltis	North America Customer Service & Logistic Manager	Marina View, Texas

## B: External Stakeholders

Name	Company / Organization	Position	Location
Jim Robertson	JCAP	Member	Joffre
Kathy Pyper	JCAP	Member	Joffre
Ken Burden	JCAP	Member	Joffre
Marie Burden	JCAP	Member	Joffre



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