



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

*INEOS Canada Partnership*

June 20 - 21, 2018



Chemistry Industry  
Association of Canada



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

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This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care<sup>®</sup> commitments. The material in this report reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member-company that is the subject of this report to interpret and act on the report's findings and recommendations as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the Association, its member-companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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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 16 & June 20/21, 2018 and included a team visit to the Joffre, Alberta facility. The team also met with a representative of the site's community advisory panel referred to as JCAP. This was the sixth Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on May 05 and June 22-23, 2015.

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 completed, and no further involvement is required by the verification team.



Dave Mack  
Verification Team Leader

July 17, 2018

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. A review of workplace exposure profiles is being carried out with a view to enhancing the facility's industrial hygiene program.
- ii. In conjunction with the Lacombe County Mutual Aid Organization, a table top emergency exercise is being planned for the fall of 2018, based upon a rail incident in the local community.
- iii. On-going work on a succession planning process to ensure that incumbents in critical Responsible Care related positions can be effectively and timely replaced when required.

### Improvement Opportunities

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

- i. Benchmark the process safety management program against the Canadian Society for Chemical Engineers- Process Safety Management Guide.
- ii. Benchmark the Joffre site emergency response plan against Canadian Standard CAN/CSA Z731-03 (R2009)- Emergency Planning for Industry.
- iii. With reference to the Operations Code section 4.v. - Critical Infrastructure/Business Continuity and the CIAC Business Continuity/Critical Infrastructure Implementation Aid, identify potentially related scenarios and impacts, and define specific contingency plans.
- iv. Consider establishing performance metrics to measure progress in improvements to environmental protection and resource conservation.
- v. Establish a program to regularly display named Responsible Care visual material, including the logo, at the entrance to the facility (e.g., flag, banner, etc.).
- vi. In customer contracts for manufactured products that originate from the Joffre facility, define specifically named Responsible Care commitments by INEOS and expectations of the customer, in a customer focussed format similar to that in the Joffre chemical suppliers' self-assessment program. Also establish a process to follow-up that these expectations are being complied with.
- vii. Facilitate community advisory panel meetings to engage and encourage community members to bring forward topics for dialogue (i.e., in addition to receiving presentations from the company).
- viii. In the bulleted list headed "We will" of the "Joffre LAO Plant's commitment to Safety, Health, Environment and Quality" document, consider adding wording with respect to supporting safety through procedures, activities and behaviours. Environment and quality are included but safety is omitted.

### Successful Practices

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

- i. The overall commitment displayed to Responsible Care at all levels of the organization, and how well activities are connected to the principles.
- ii. The comprehensive on-line documented management system which pulls Responsible Care related information together and makes this readily available at the facility.

## 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.canadianchemsitry.ca](http://www.canadianchemsitry.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 contacting the Director, Responsible Care at [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) or (613) 237 6215 extension 233.

## 1.2 About INEOS

INEOS Canada Partnership owns and operates a Linear Alpha Olefins (LAO) manufacturing facility at Joffre, Alberta, which began operating in September 2001. The company shares the Joffre site with another major petrochemical manufacturer and an electricity cogeneration facility.

At 250,000 metric-tons per year INEOS incorporates world-leading proprietary technology in the production of LAOs which a family of chemical intermediates are used in the production of other chemicals and final products. LAOs include butane (a gas at room temperature) and 1-hexene, 1-octene, 1-decene, 1-dodecene, 1-tetradecene, 1-hexadecene, 1-octadecene which are typically colourless liquids and C20+ (a waxy solid at room temperature). These are normally produced and sold as pure products but are often blended to meet customer requirements.

LAOs are used in the production of polyethylene, as intermediates for the manufacture of linear plasticizers for polyvinyl chloride, as raw material for the manufacture of 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. Some of INEOS' LAOs are marketed as Amodrill® synthetic-based drilling muds.

## 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 16 & June 20/21, 2018 and included a team visit to the Joffre, Alberta facility. The team also met with a representative 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 sixth Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on May 05 & June 22/23, 2015

The verification team was comprised of the following individuals.

<b>Name</b>	<b>Affiliation</b>	<b>Representing</b>
Dave Mack	Consultant	<i>Industry</i>
Keith Purves	Consultant	<i>Public at Large</i>
Jim Robertson	JCAP Member	<i>Local Community</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**

A comprehensive management of change procedure, designed to ensure that no unacceptable risks are introduced into the operation, is applied when changes are made to the manufacturing process and equipment. Process hazard assessments are applied to all changes. There are defined steps to determine the appropriate process hazard assessment methodology to be applied. There is a project execution manual in place that addresses all aspects of project management, design and construction, including a safety review prior to start up. A detailed flow chart has been established to navigate through all steps from project initiation to closure.

### **2.1.2 Operations Activities**

Every 5 years, on a rotational basis, a hazard and operability revalidation study is done on the entire manufacturing operations. This is carried out to continually assess the controls in place for on-going safe and environmentally responsible operations. Formalized operating, maintenance and emergency procedures are in place. Emergency procedures are on an annual review cycle with other procedures on a three-year cycle.

The on-site laboratory is operated by a contracted service provider that is certified to the International Organization for Standardization requirements for laboratory competence. The Canadian Association of Laboratory Accreditation certifies the testing procedures. Laboratory statistical quality control and assurance plans are in place.

Major railroad carriers are contracted to ship all products manufactured at the site. Recognized industry specifications are in place for the rail cars, which are either owned or leased. Contracted service providers carry out regular inspections and maintenance on all rail cars. Defined procedures are in place for rail car loading. Responsible Care related performance is monitored for the railroads.

For manufacturing operations, equipment critical to the safe and efficient operation of the plant has been defined. Scheduled preventive maintenance and inspection programs are in place. A comprehensive work prioritization matrix is used to determine priorities for the execution of equipment repair.

### **2.1.3 Safety and Security**

In the area of occupational health and safety, there are ten principles in place that address people safety. There is also a program in place referred to as “SafeStart” which focusses on how people can keep themselves safe and how to keep others from being hurt. A full pre-task hazard assessment is carried out prior to commencing non-routine work on facilities and equipment. Similar assessments are also built into routine operating and maintenance procedures. There is an industrial hygiene program in place (currently under review) which includes job exposure profiles used in determining worker health and safety protective measures. There is an established employee health monitoring program in place. Occupational health and safety work procedures are defined. Contractors on site are expected to conform to these procedures.

In the area of process safety, there are ten related principles in place that address equipment integrity and loss of containment avoidance. The previously mentioned five-year hazard and operability study revalidation process is used to regularly assess hazard potential. A worst-case incident scenario was defined initially at the plant design stage by a recognized industry consultant. This was reviewed a couple of years ago. A defined process safety management program is in place.

Manufacturing site emergency response is coordinated on an overall Joffre site basis, with the INEOS facility being considered as a unit within the overall Joffre site plan. There is a specific plan in place for the INEOS unit. Operating technicians function as first responders, supported by specialized personnel and equipment common to the Joffre site. Emergency drills are regularly held by each operating team. INEOS is an active member of the local mutual aid group referred to as the “Lacombe County Mutual Aid Organization”. Major mutual aid exercises are 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. Transportation emergency exercises are regularly held.

With regard to site security, all recommendations from a recent manufacturing site vulnerability assessment have been implemented and a security plan is in place. The site is fenced with security cameras 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, rail car sealing and manifesting. Once rail cars are handed over to the railroad companies for shipment, their security processes come into force.

Potential critical infrastructure and site business continuity impacts (i.e., those considered to be beyond typical operational emergencies) have been considered and contingency plans discussed but not documented. There is a defined incident reporting and investigation process in place, which addresses incident review, identification of root cause and actions to be taken to prevent recurrence. Shared learnings are distributed across the facility and in some cases across the entire corporation. There is also a process upset review program in place focusing on root cause identification and preventive actions.

#### **Improvement opportunities**

- i. Benchmark the process safety management program against the Canadian Society for Chemical Engineers- Process Safety Management Guide.
- ii. Benchmark the Joffre site emergency response plan against Canadian Standard CAN/CSA Z731-03 (R2009)- Emergency Planning for Industry.
- iii. With reference to the Operations Code section 4.v. - Critical Infrastructure/Business Continuity and the CIAC Business Continuity/Critical Infrastructure Implementation Aid, identify potentially related scenarios and impacts, and define specific contingency plans.



### **Works in Progress**

- i. A review of workplace exposure profiles is being carried out with a view to enhancing the facility's industrial hygiene program.
- ii. In conjunction with the Lacombe County Mutual Aid Organization, a table top emergency exercise is being planned for the fall of 2018, based upon a rail incident in the local community.

#### **2.1.4 Environmental Protection**

Emissions to air and water are known and quantified. There are no toxic emissions from the site. Greenhouse gas emissions are verified annually by an independent party. A leak detection and repair program is in place to identify and deal with fugitive emissions from equipment.

Waste management procedures are defined. An approved service provider is contracted to manage waste handling, transport and disposal operations. There is a process in place to monitor the Responsible Care related performance of the waste service provider.

There are no specific emissions or waste reduction metrics in place, however this is monitored and addressed through on-going activity-based objectives.

There is a defined environmental management system in place, which is registered and conforms to the International Organization for Standardization ISO 14001-2015.

#### **Improvement opportunity**

- i. Consider establishing performance metrics to measure progress in improvements to environmental protection.

#### **2.1.5 Resource Conservation**

Conservation of resources is addressed through on-going operational controls on their consumption. There are no specific resource conservation metrics in place, however this is monitored and addressed through activity-based objectives. A furnace optimization project is currently underway focusing on energy reduction opportunities.

#### **Improvement opportunity**

- i. Consider establishing performance metrics to measure progress in improvements to resource conservation.

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

There is a Responsible Care training module provided to all new hires. This is on-going for all employees. An annual onsite event is held, referred to as Responsible Care Wellness Days. 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 administration building. Responsible Care is also mentioned on the company web site.

#### **Improvement opportunity**

- i. Establish a program to regularly display named Responsible Care visual material, including the logo, at the entrance to the facility (e.g., flag, banner, etc.).

### **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**

There is some work being done at the facility to investigate the use of existing products in new market applications, which may include product modification. The previously mentioned management of change process is applied to any related modifications. Work is on-going with the corporation's product stewardship group with respect to the preparation of any new product risk management information that may be required. The corporation's product stewardship group maintains safety data sheets for Joffre products and provides consulting services to customers, regarding any existing product risks. Reviews of existing product risk information are on-going through involvement with industry consortiums.

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

INEOS other parties in this section include product trans-loading terminals, chemical product suppliers, site contractors, laboratory services and customers. Contract carriers and waste contractors are addressed in the Operations Code. There are processes in place that include for Responsible Care related expectations with respect to the selection and performance monitoring of terminals, chemical product suppliers, site contractors and laboratory services. New customers are assessed and qualified based on end use and safety performance, prior to product delivery. In addition to providing product safety data sheets, there are general references to health and safety expectations included in customer contracts. Sales personnel routinely follow-up with customers with respect to their performance.

#### **Improvement opportunity**

- i. In customer contracts for manufactured products that originate from the Joffre facility, define specifically named Responsible Care commitments by INEOS and expectations of the customer, in a customer focused format similar to that in the Joffre chemical suppliers' self-assessment program. Also establish a process to follow-up that these expectations are being complied with.

### **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 other operations on an overall Joffre site basis. The local community is primarily defined as those residing or doing business within a five-kilometre radius of the plant. This is based upon the other Joffre site petrochemical manufacturer's potential worst-case scenario for off-site impact. The City of Red Deer and Lacombe County are also considered as part of the site community. There is a community advisory panel in place with representation from those within the five-kilometre radius. Meetings are held quarterly, and semi-annual open houses take place. Responsible Care related performance is communicated, and dialogue takes place at these sessions. Social Responsibility at the facility focusses on providing financial support to community or charitable groups and organizations that will in turn offer volunteerism opportunities for employees, in the categories of youth, community, education, environment, health and human services. There is a charitable volunteer policy in place that allows employees to take paid time off when volunteering at charitable events.

#### **Improvement opportunity**

- i. Facilitate community advisory panel meetings to engage and encourage community members to bring forward topics for dialogue (i.e., in addition to receiving presentations from the company).

#### **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. Meetings are regularly held with Lacombe County officials. 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 Observations on the PLAN Step**

During the 'PLAN' Step of the management system, the company is required to decide 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.

There is a policy in place referred to as "Joffre LAO Plant's commitment to Safety, Health, Environment and Quality Performance". Responsible Care related objectives are established annually and documented in what is referred to as a "Performance Contract" for the facility. Responsible Care Codes of Practice, business requirements, stakeholder input, and industry leading practices are considered. Team and individual objectives flow from these overall objectives.

#### **Improvement opportunities**

- i. In the bulleted list headed "We will" of the "Joffre LAO Plant's commitment to Safety, Health, Environment and Quality" document, consider adding wording with respect to supporting safety through procedures, activities and behaviours. Environment and quality are included but safety is omitted.

#### **3.2 Observations on the DO Step**

During the 'DO' Step in the management system, the company is required to convert the decisions of the 'PLAN' Step into action and ensure 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.

There is a defined management system in place which is referred to as the "Joffre Management System". This is linked to the CIAC Responsible Care code requirements in a comprehensively documented spread sheet referred to as the "Responsible Care Cross Reference". All employees are accountable for Responsible Care related implementation within their sphere of influence, with subject matter expertise available as necessary. Employees are trained in a broad range of Responsible Care related activities as applicable to their roles. There are a number of defined processes and procedures in place to address Responsible Care related activities.

#### **Work in Progress**

- i. On-going work on a succession planning process to ensure that incumbents in critical Responsible Care related positions can be effectively and timely replaced when required.

### **Successful Practices**

- i. The overall commitment displayed to Responsible Care at all levels of the organization, and how well activities are connected to the principles.
- ii. The comprehensive on-line documented management system which pulls Responsible Care related information together and makes this readily available at the facility.

### **3.3 Observations on the CHECK Step**

During the 'CHECK' Step in the management system, actions carried out in the 'DO' Step are required to be 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 should be reviewed along with employee competences for assigned responsibilities, internal and external audits should be undertaken, incidents should be assessed to identify root causes, and performance measurement should 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 and process safety audits every three years, annual environmental management system audits (external & internal), overall management system audits every three years, and insurance audits every 2 to 3 years. There is also a routine site inspection program in place. Incident reporting and investigation is addressed in the Operations Code.

### **3.4 Observations on the ACT Step**

During the 'ACT' Step in the management system, the company is required to translate the results of the 'CHECK' Step into corrective actions for improvement. This includes revisiting the 'PLAN' Step to decide whether changes are needed to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the 'ACT' Step should 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.

Action items from objective reviews, 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 actions, and a follow-up process to ensure that actions are taking place and being closed out in a timely manner when correctly addressed.

Responsible Care related performance results are reported internally each month, and each quarter to the site's community advisory panel, as well as at semi-annual community open houses. There is an annual report for external distribution entitled Joffre LAO Plant – Responsible Care Statement. 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. Site contractor performance is addressed in the Stewardship Code. Updates to objectives, processes and procedures may result from reviews of the above information.

## **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 the following elements of the *Responsible Care Ethic and Principles for Sustainability*. Refer to the explanatory notes following each element:

- *Work for the improvement of people's lives and the environment, while striving to do no harm.*  
[Supported by a clear commitment to Responsible Care]
- *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.*  
[Supported by commendable community outreach efforts]
- *Take preventive action to protect health and the environment.*  
[Supported by a well-defined management system with connected environment, health and safety processes and procedures]
- *Innovate for safer products and processes that conserve resources and provide enhanced value.*  
[Research and development activities related to this aspect are addressed at the INEOS corporate level. However, some effort is underway to develop new product applications at the facility]
- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*  
[Supported by processes to select and monitor Responsible Care related performance of chemical suppliers, product transloaders and customers. However, an opportunity exists to improve this aspect with customers]
- *Understand and meet expectations for social responsibility.*  
[Supported by commendable efforts in this area, focussing on youth, community, education, environment, health and human services. Policies address diversity and harassment prevention.]
- *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.*  
[In addition to CIAC involvement, some interface with stakeholders other than the operating site community, on an opportune basis]
- *Promote awareness of Responsible Care and inspire others to commit to the principles.*  
[On-going efforts in this area with business partners]

## **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 completed, 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.

We welcome the opportunity to share with the verification team how we manage our operations, we are extremely pleased that the team included a member from our local community giving them firsthand knowledge of our operations.

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 site.

We will give consideration to the Improvement Opportunities identified by the 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.  
July 16, 2018



## Interview Lists

**A: Company Personnel**

<b>Name</b>	<b>Position</b>	<b>Location</b>
Andy Nokes	Project Engineer	Joffre, Alberta
Barry Miller	Maintenance/ Project Engineering Manager	Joffre, Alberta
Brad Campbell	Process Engineering Lead	Joffre, Alberta
Bruce Doll	E&I Specialist	Joffre, Alberta
Christina Duppstadt	SHEQ Advisor	Marina View, Texas
Cory Marasco	E&I Technician	Joffre, Alberta
Chuck Obst	Environmental Specialist	Joffre, Alberta
Dale Verbeek	Senior Safety Specialist	Joffre, Alberta
Gary Cole	Finance Manager	Joffre, Alberta
Gordon Schiller	Logistics Supervisor	Joffre, Alberta
Heath Savill	Insulator	Joffre, Alberta
Jeff Beztilny	Operations Manager	Joffre, Alberta
John Mulgrew	HR/SHE Manager	Joffre, Alberta
Kendall Kowalchuk	Procurement Manager	Joffre, Alberta
Kevin Ratliff	Market Manager	Marina View, Texas
Mohammed Zakaria	Process Engineer	Joffre, Alberta
Noel Dearing	Operations Technician	Joffre, Alberta
Pat Blinkhorn	Scaffolder	Joffre, Alberta
Reg Steele	Operations Maintenance Coordinator	Joffre, Alberta
Scott Soltis	North America Customer Service & Logistic Manager	Marina View, Texas

**B: External Stakeholders**

<b>Name</b>	<b>Company / Organization</b>	<b>Position</b>	<b>Location</b>
Sean Morton	JCAP	Member	Joffre



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