



**Chemistry Industry Association of Canada**      **Association canadienne de l'industrie de la chimie**

# **RESPONSIBLE CARE<sup>®</sup>**

## **VERIFICATION REPORT**

### **ERCO WORLDWIDE**

*May 2<sup>nd</sup>, 3<sup>rd</sup>, and 22<sup>nd</sup>, 23<sup>rd</sup> 2013.*

#### **Disclaimer**

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC) to provide advice to the above company and assist it in meeting its Responsible Care commitments as a member of the Association. The material in it 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 which is the subject of this report to interpret and act on the findings and recommendations in this guidance document 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.

® Responsible Care is a registered trademark of the Chemistry Industry Association of Canada.

# EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of ERCO Worldwide. The verification was undertaken on May 2<sup>nd</sup>, 3<sup>rd</sup> and 22<sup>nd</sup>, 23<sup>rd</sup> 2013 and included team visits to the Toronto Corporate Offices and the North Vancouver manufacturing site. The verification team also conducted interviews with other company personnel and external stakeholders at locations the team was unable to visit. This was the sixth Responsible Care verification completed for ERCO Worldwide. The last verification was completed in July 2010.

While considering all aspects of the Responsible Care Commitments during this verification the team placed an emphasis on conducting an in-depth examination of company aspects related to:

- Implementation of a Process Safety management system based on the OSHA 29 CFR 1910.119 standard

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 team believes that the company is capable of responding to the two Findings Requiring Action identified during the verification - summarized below and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.



Verification Team Leader June 11, 2013

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**

### **Findings Requiring Action**

1. It is a finding requiring action that there is not a documented management system for the promotion of Responsible Care® “by name”.
2. It is a finding requiring action that the North Vancouver location does not have a management system to field test the emergency response plan “on a regular basis” as required by OP40.

### **Works in Progress**

1. There is a project at the corporate level to upgrade the Disaster Recovery Contingency plan.
2. The corporate Security Management System is being revised to include the requirements of OP48 “malicious intent”.
3. The North Vancouver location has a plan, in 2012, to complete the requirements of OP39 (risk communication) by contacting residential neighbours concerning their knowledge of the required action to take in the event of a site emergency that could have impacts off-site. Industrial neighbours, who are in the closest proximity to the site, have been contacted.

### **Improvement Opportunities**

1. There is an improvement opportunity at the North Vancouver site in relation to OP7 (d) to ensure site employees know the hazards presented by industrial neighbours and what action to take if an off-site event should occur.
2. There is an improvement opportunity at the North Vancouver site to contact the local hospital emergency ward to ensure they are aware of, and could treat, potential employee injuries related to site operations.
3. There is an improvement opportunity at the North Vancouver site to obtain and review the complete marine barge safety inspection document.
4. There is an improvement opportunity at the North Vancouver site to apply the requirements of OP64 (identifying and classifying waste) to any future dredging operations at the barge loading dock area.
5. There is an improvement opportunity at the corporate level to review each site Community Outreach Plan and ensure that the risk communication requirements (OP39) are explicit in each plan.

## **Successful Practices (North Vancouver)**

1. The site management system identified the requirements of code element OP49 (ability to operate under different scenarios) and proactively qualified a local warehouse prior to the upset conditions anticipated at the site.
2. In relation to successful practice #1 the site applied for a temporary air quality permit for the installation of a temporary boiler. This was the first time the Province had been approached for this type of permit.
3. The site utilized process improvement technology to improve process operating parameters that resulted in a 50% reduction in chromium contaminated process waste.
4. The site implemented a successful project to capture and resell process waste hydrogen.
5. This relatively small site hosted a National Advisory Panel meeting in 2012.

## **Successful Practices (Corporate)**

1. As per the Corporate ERCO Responsible Care® Committee mandate this committee rotates the meeting location to encompass all manufacturing locations.
2. The Company utilizes quarterly communication meetings as a vehicle for the promotion of Responsible Care®.
3. The Corporate Process Safety Management System utilizes the concept of “leading indicators” as a component of the auditing function.
4. As a component of the Research and Development Management System raw Materials that are used in company products are assessed and quantified for their societal Impact.
6. In relation to the requirements of ST103 (product security throughout the value chain) the valves of tank cars utilized for shipping High-risk products and raw materials are protected by anti-tampering devices.
7. The new Corporate Management System for transportation emergency response (TEAPIII) has been recognized by the CIAC as a successful practice and the suggested Template for other member companies.
8. The ERCO Human Resources department has developed managerial level training courses with specific Responsible Care® training modules.

# 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 ERCO Worldwide 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, ERCO WORLDWIDE 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 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)). ERCO WORLDWIDE 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 CIAC Responsible Care Manager at [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) or (613) 237-6215 extension 233.

## **1.2 About ERCO Worldwide**

ERCO Worldwide is a Canadian Company and a wholly owned subsidiary of Superior Plus LP located in Calgary Alberta. The ERCO Worldwide corporate offices and research and Development laboratories are located in Toronto Ontario.

ERCO Worldwide produces sodium chlorate, sodium chlorite and chlor-alkali products. The company is also the leading world wide supplier of chlorine dioxide technology to the pulp and paper industry. In addition the company markets chlorine dioxide generators to the paper industry.

The company employs approximately 500 people world wide and operates nine manufacturing facilities six of which are located in Canada, two in the United States and one in Chile. The facilities located in the United States and Chile were not included in this verification. The company is a member of the Responsible Care® governing body in both the United States and Chile and the respective locations are certified or verified by that association.

**For additional information about ERCO Worldwide visit: <http://ercoworldwide.com>**

## **1.3 About This Verification**

The verification of ERCO WORLDWIDE was conducted on May 2<sup>nd</sup>, 3<sup>rd</sup>, 22<sup>nd</sup> and 23<sup>rd</sup> 2013 and included team visits to the Toronto Corporate offices and the North Vancouver manufacturing site. The verification team also conducted interviews with other company personnel and external stakeholders at locations the team was unable to visit. During the course of the verification, the team had the opportunity to interact with a wide range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This is the sixth verification exercise completed for ERCO Worldwide. The last verification was completed on July 2010.

The verification team was comprised of the following individuals.

<b>Name</b>	<b>Affiliation</b>	<b>Representing</b>
Cam Dillabough	CIAC	<i>Team Leader</i>
Archie Kerr	CIAC	<i>Industry verifier</i>
Kris Lee	CIAC	<i>Public-At-Large Verifier</i>
Patricia Banning-Lover	CEO, Wild Bird Trust	<i>Community Representative</i>

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

During the verification of ERCO Worldwide 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). While considering all aspects of the Responsible Care Commitments, the team placed an emphasis on conducting a more in-depth examination of certain company aspects identified by the company or the team related to: Implementation of a Process Safety management system based on the OSHA 29 CFR 1910.119 standard

In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Findings Requiring Action;** document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.
2. **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.
3. **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.
4. **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

#### 2.1.1 Design and Construction of Facilities and Equipment

There are comprehensive management systems in place to comply with the expectations of this code area. Depending on the scope of each individual project the company has in-house engineering capabilities or a working relationship with third party engineering firms. Oversight controls are in place to ensure third party companies adhere to Responsible Care® expectations.



### **2.1.2 Operations Activities**

There are comprehensive management systems in place to comply with the requirements of this code area. The Company will be challenged in the near future with a significant turn over in personnel anticipated due to retirements. The Company recognizes this fact and does have robust employee training systems in place. In 2009, a new position was created to manage non-operational compliance, titled Logistics Compliance Manager. A major project that was assigned to this position was to institutionalize the ERCO TEAP III program. In addition as a further enhancement to the existing Transportation Emergency Response Plan, a software program was developed to ensure the company on-scene emergency technical advisors have the ability to provide up-to-date product and raw material technical specifications.

### **2.1.3 Safety and Security**

The 2010 verification had listed findings requiring action and improvement opportunities relevant to process safety management in the area of completing risk assessments at the newly acquired Hargrave Manitoba location. In response to the verification report and other internal safety auditing processes the company hired four additional engineering resources, revised the corporate risk assessment management system and adapted a structured United States based process safety management (PSM) system to the non United States based operations. The improvements to the Company's PSM were a focus area for the verification and the verification team recognizes the commitment to additional resources and implementation of a vastly improved PSM that provides consistency in the application of PSM across all global locations. The verification team reviewed 2013 Community Outreach Plan for the North Vancouver site.

While the plan was very comprehensive an obvious direct link to "risk communication" (OP39) was not evident. The team has listed an improvement opportunity referencing this observation. The team also listed improvement opportunities concerning employee hazard communication, ensuring the capabilities and site hazard knowledge of the local hospital emergency receiving room and obtaining a complete shipping barge safety inspection document.

Various ERCO Worldwide locations have been awarded product handling safety awards over the years. Most notable would be the Buckingham PQ facility that has been recognized for eleven years in the category of companies shipping four hundred plus shipments a year without a non-accidental release. The Company as a whole was awarded a "gold" level award for one thousand plus shipments without a non-accidental release. The ERCO Worldwide Wisconsin facility was awarded the Chlorine Institute Chairman's award for exemplary PSM in 2012.

### **2.1.4 Environmental Protection**

A subcommittee of the ERCO Responsible Care® Committee is the Environmental Technical Committee. The mandate of this committee is to establish corporate goals to reduce the overall environmental foot print of the Company. To that end reduction opportunities, targets and potential increase of required resources are identified for each site and then the site is given the task of achieving site environmental improvements, with corporate support if required, that support the overall efforts of the company. For new sites and processes there is a corporate level stage and gate management system that includes research and development, process

design and construction that takes into account not only the regulatory requirements but the Responsible Care® Ethic of “doing the right thing”. During the verification the team was given several anecdotal examples of the Ethic being applied to improve processes beyond regulatory compliance. The team has listed an improvement opportunity at the North Vancouver site regarding developing a sampling and classification protocol for material dredged from the barge loading area.

#### **2.1.5 Resource Conservation**

This area of the protocol is linked to the overall corporate environmental management system. ERCO manufacturing sites do not require a large inventory of raw materials or intermediate chemicals. Electrical energy is a production component and accounts for a large percentage of the cost of production. The company has several continuous process management systems and conservation projects to reduce the resources consumed by the various processes. The ERCO Worldwide Buckingham PQ plant was awarded an “Elite” status in the Hydro-Quebec “Energy Savers Circle” awards program for energy conservation projects in the category of “large consumers of electric power”.

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

ERCO Worldwide has been very successful in instilling the Responsible Care® Ethic and name recognition into the day to day operations of the company. The 2010 Responsible Care® Protocol requires companies to have in place a management system which encourages third parties with whom the company does business to adopt Responsible Care® related performance goals, plus encourage the adoption of the Responsible Care® principles up and down the value chain, and promote Responsible Care® “by name” with third party business contacts. The company does not have in place a management system to cover all expectations of the 2010 protocol, in regard to promoting Responsible Care® by name, and the team has listed this gap as a finding requiring action.

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

Based on the commitment to Responsible Care® by ERCO Worldwide there is a comprehensive and robust management system in place to support the requirements and expectations of the stewardship code including sections 2.2.1 and 2.2.2 listed below.

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

The management system is based on the Plan, Do, Check and Act structure and encompasses the Responsible Care® expectations involved in research and development, communication of hazards, customer support and product and raw material security.

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

Appropriate sub management systems are in place for the management of customers, suppliers and third parties. Because of the company business philosophy there is a close working relationship with customers which in some cases involves maintaining and managing embedded

process units. The team was give several anecdotal examples of the Responsible Care® Ethic being promoted with customers, suppliers and third parties.

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

### **2.3.1 Operating Site Communities**

A management system is in place to address the requirements and expectations of this sub-section of the Accountability Code. Each operational site develops a community dialogue plan based on the potential impact of the site on the community and the population density relative to the site. Social responsibility commitments are a component of the plan. These plans are reviewed and revised annually. Community Advisory Panels are in place at three Canadian sites.

### **2.3.2 Other Stakeholders**

The requirements and expectations of section 2.3.2 are managed on a two tier basis. At the Corporate level ERCO Worldwide senior management very actively interface at the federal and provincial government level and within various industry associations including the CIAC At the site level Community Outreach Plans, which are reviewed annually, describe the expectations of site managers in this area. The expectation for site managers in the area of dialogue with community stakeholders is an explicit part of the Plant Manager Position Profile.

### **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 ERCO Worldwide 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 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.

#### **3.2 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.

#### **3.3 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.

#### **3.4 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.

## Synopsis

As noted previously in this report this is the sixth verification of ERCO Worldwide. Previous verifications have delved into the company management system and the 2010 report, based on the 2005 protocol, reported a comprehensive management system that met all expectations of the company Responsible Care® commitment. Although the Responsible Care® expectations as described in the revised 2010 verification protocol reflect a focus on sustainability the 2013 verification team found that a robust management system still prevailed based on the Plan, Do, Check and Act model ascribed in the 2010 protocol. A long standing cross reference document demonstrating how company management systems supported the original 151 Responsible Care® code elements was utilized to develop a gap analysis document to ensure any management system revisions required to support the 2013 protocol were addressed in a timely manner. During the verification process various managers utilized the Plan, Do, Check and Act model to demonstrate revised management systems for Process Safety Management, Product Stewardship and the annual planning process for the North Vancouver site.

Additional examples of the Responsible Care® Management System functionality are identifying the need for a more robust process safety management system, improved employee safety performance and a required revision of the transportation emergency response management system to comply with TEAP III requirements.

## 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 ERCO Worldwide 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:

*(With reference to the Responsible Care Ethic and Principles for Sustainability and the suggested attributes of a responsible Care company, please cite the two or three most important examples of where the team observed the company’s commitment to the Responsible Care Ethic and Principles For Sustainability. Which principles is the company most visibly committed to? Likewise, please communicate the two or three most important principle as applicable which may not yet be visible in steering the company’s decision making and actions. Where applicable, observations can be communicated by linking characteristics of a Responsible Care company (see Appendix E of the Responsible Care Commitments) to a specific decision, practice, or action observed during the verification.)*

*Where appropriate, please describe the team’s observations using the agreed terminology of ‘Successful Practices’, ‘Improvement Opportunities’, ‘Findings Requiring Action’ and ‘Works in Progress’*

The team is also encouraged to be ‘sparing’ in the identification of Findings Requiring Action. Minor and less consequential variations are best communicated through Verbal Remarks from the team to the company

### ***There are eight Principles for Sustainability:***

- ***Work for the improvement of people’s lives and the environment.***
- ***Be accountable& responsive to the public and local communities.***
- ***Take preventative action to protect health and the environment.***
- ***Innovate for safer products & processes that conserve resources and enhance value.***
- ***Engage business partners to ensure stewardship and security of products throughout their lifecycles.***
- ***Understand and meet expectations for social responsibility.***
- ***Work with stakeholders for public policy & standards that enhance sustainability, advance legal requirements & and meet or exceed their letter & spirit.***

- ***Promote awareness of Responsible Care® and inspire others to commit to these principles.***

During the information exchange process and during interviews with the company President, various managers and hourly employees it became evident that the Responsible Care® Ethic underpins the daily functions of the company. The business plan for the products produced by ERCO Worldwide can be challenging because of the raw materials required for production, the transportation of hazardous materials and legacy environmental considerations due to acquisitions. The Company has demonstrated a focus on eliminating hazards to human health and the environment through their research and development focus, engineering design of processes and a commitment to make appropriate ethically based decisions even though traditional return on investment criteria are not evident.

The ERCO Worldwide Product Stewardship Management System exhibits all the expectations of the CIAC Stewardship Code which has a primary focus on Sustainability Principles number one and three as well as principle number eight. The company is a benchmark for other CIAC member companies concerning the focus on “promoting Responsible Care® and inspiring others to commit to the Principles”.

The company has developed a technology as an alternative to the use of chlorine as a bleaching agent in paper production. The decrease in the use of chlorine has also greatly reduced compounds such as furans and dioxins, traditionally present in paper mill effluent. This reduction in the use of chlorine in turn reduces the number of chlorine railcar shipments in North America.

In relation to Principle number two, ERCO Worldwide has a comprehensive Community Dialogue Management System that has been developed and refined through a process of building new facilities in varied cultures and through acquisitions of sites from other companies where alleviating concerns about new ownership within the community can be paramount. As a part of this process the Company proudly leads with their commitment to Responsible Care® and the Ethic of Sustainability.

In relation to Principle number seven the company is again a benchmark for other CIAC member companies with their commitment to this Principle through encouraging managers to actively support the CIAC and actively support the CIAC and the chemical industry in general, at the federal, provincial and municipal levels of government.

## **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 two 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 ERCO Worldwide I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

“This is sixth verification ERCO Worldwide. The approach used during this verification was well-structured with a consistent theme that encouraged us to demonstrate the Plan-Do-Check-Act nature of our management systems. The team was well-balanced, professional and prepared for their site visits. The involvement of the community representatives at our facilities was positive. The experience of the verification team provided information that enabled us to benchmark ourselves against others in the industry and consider opportunities for improvement. We thank the team for sharing their insights and for effectively engaging the organization in discussions on all aspects of Responsible Care.”

ERCO WORLDWIDE 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 the Findings Requiring Action 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.

Sheila S. Burke  
Vice President, Regulatory Affairs & External Relations  
ERCO Worldwide  
July 25, 2013

## INTERVIEW LISTS

**A: Company Personnel**

Name	Position	Location
Paul Timmons	President	Toronto
Sheila Burke	V.P. Regulatory Affairs and External Relations	Toronto
Edward J. Bechberger	Senior V.P. Sales & Operations	Toronto
John F. Christie	V.P. Supply Chain	Toronto
Patrick Lefebvre	V.P. Human Resources	Toronto
Steve Webb	V.P. Finance	Toronto
Paul Rea	Director Customer service and logistics	Toronto
Laurie Kelly	Senior Environmental Engineer, Manager, Regulatory Affairs	Toronto
Emily Fattore	Manager, Logistics Compliance	Toronto
Marvin C. Medelko	Operations Technical Manager	Toronto
Don Smiegielski	Director, Health and Safety	Grande Prairie, AB
Thomas N. Miller	Plant Manager	North Vancouver
Helen S. Holt	Administration Manager	North Vancouver
Maureen Clarkson	Process Chemist Responsible Care Coordinator	North Vancouver
Henry Gee	Commercial Manager	North Vancouver
Paul Leyen	Technical & Environmental Manager	North Vancouver
Brian P. Scott	Production Manager	North Vancouver
Hugh Weir	Maintenance Manager	North Vancouver
Arne Van Horn	Relief operator	North Vancouver
Dave Larson	Crystal operator	North Vancouver

**B: External Stakeholders**

Name	Company / Organization	Position	Location
April English	The YES Group Inc.	CAP facilitator	North Vancouver
Jane Thornthwaite	M.L.A.	observer	Seymour, North Vancouver
John Hunter	J.Hunter& Associates Ltd.	CAP member	Seymour, North Vancouver
Doug Allen	Community Planner, North Vancouver	observer	North Vancouver
Mike Andrews	North Shore EMO	observer	North Vancouver
John Walkley		CAP member	North Vancouver
John Miller		CAP Member	North Vancouver
Lorraine Harvey		CAP Member	North Vancouver