

# Responsible Care® Verification Report

***NORTHWEST TANK LINES INC.***

ARIL 22 & JUNE 28/29, 2022



**CHEMISTRY INDUSTRY  
ASSOCIATION OF CANADA**



**Responsible Care®**  
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® 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 Northwest Tank Lines Inc. The verification was undertaken on April 22 & June 28/29, 2022, and included team visits to the Langley office, a nearby contracted vehicle maintenance facility and a leased vehicle parking area. This is the fifth verification exercise completed for Northwest Tank Lines Inc. The last verification was completed on April 18 & June 18/19, 2019

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.



Signed: \_\_\_\_\_  
Dave Mack  
Verification Team Leader

Date: August 03, 2022

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

The following relate to instances where the current status is at variance with the requirements of the CIAC Responsible Care Model for Transportation Partners

- i. Establish and document a process for community outreach at fixed facilities to include, but not limited to, identification of those who may be impacted by company operations/emergencies, what will be communicated, how and at what frequency will it be communicated, and keeping abreast as to how changes in the community may impact company operations [ref. Responsible Care Model for Transportation Partners, TransCAER, 1. Public Awareness].

### Works in Progress

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

- i. Ongoing activities related to enhancing information technology systems security.
- ii. Developing a plan to prepare for, respond to, and recover from large scale emergencies that are above and beyond typical operational scenarios (ref. CIAC Business Continuity and Critical Infrastructure Guide).

### Improvement Opportunities

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

- i. Establish and document a defined management system for greenhouse gas emission reductions.
- ii. In the Responsible Care related management system document, some requirements are quoted as needing to be done “regularly”. Consider making these more time specific.
- iii. In the Responsible Care related management system document, element 2.2 (Corporate Governance) specifically define what actual management meetings will occur.

### Successful Practices

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

- i. The use of video technology to support effective transportation route risk assessments.
- ii. Participation in the “CleanBC Go Electric Commercial Vehicle Pilots Program”, which supports organizations looking to deploy zero-emission commercial vehicles.
- iii. The Health, Safety and Environment action planning, tracking and follow-up program.
- iv. The entire Responsible Care related management system documentation and support processes (e.g., driver’s manual, etc.).

## 1. Introduction

### 1.1 About Responsible Care Verification

As a partner of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Northwest Tank Lines Inc. operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Model for Transportation Partners 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, Northwest Tank Lines Inc. 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 CIAC Responsible Care Model for Transportation Partners, 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 partnership; 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 partnership.

Verification is conducted according to a common protocol, developed by the association's partners and others, including several critics of the chemical industry. The verification is typically 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)). Northwest Tank Lines Inc. 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 [jstevens@canadianchemistry.ca](mailto:jstevens@canadianchemistry.ca) or 613 237 6215 ext 227.

## 1.2 About Northwest Tank Lines Inc.

Northwest Tank Lines provides bulk road transportation services of natural gas liquids and chemicals to the midstream oil and gas and pulp and paper industries in Alberta and British Columbia respectively. In addition to office staff, around 200 drivers are active in road transport operations. About 75% of the drivers are owner operators, the remainder being company employees. The company functions from offices in Calgary and Sturgeon, Alberta, and Langley British Columbia, with vehicle parking facilities in Sturgeon, Langley, and Chetwynd also in British Columbia.

## 1.3 About This Verification

The verification of Northwest Tank Lines Inc. was conducted on April 22 & June 28/29, 2022, and included team visits to The Langley office, a nearby contracted vehicle maintenance facility and a leased vehicle parking area. During the course of the verification, the team had the opportunity to interact with a representative range of company personnel. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This is the fifth verification exercise completed for Northwest Tank Lines Inc. The last verification was completed on April 18 & June 18/19, 2019

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>
Phil Byer	Consultant	<i>Public-At-Large Verifier</i>
Jim McGregor	Langley Resident	<i>Community Representative</i>

## 2. Team Observations concerning commitments related to the Responsible Care Model for Transportation Partners

During the verification of Northwest Tank Line Inc., the verification team looked for evidence that the company was addressing the expectations documented in the CIAC Responsible Care Model for Transportation Partners.

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 expectations contained in the CIAC Responsible Care Model for Transportation Partners. 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 partnership.
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 CIAC Responsible Care Model for Transportation Partners, 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 CIAC Responsible Care Model for Transportation Partners are as follows:

### 2.1 Team Observations Concerning Health and Safety

The Health and Safety Theme defines health and safety expectations regarding all company operations along transportation routes and at fixed facilities.

#### 2.1.1 Occupational

New products and new customer loading/unloading facilities are assessed to identify and address any health and safety hazards, prior to commencement of related operations. Some customers require a formalized hazard analysis to be done on each loading/unloading event. Driving time and on-road performance are monitored using in-vehicle online computerized logs. Field safety personnel have been assigned with a primary role to provide oversight to safe operations along transportation routes and at

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equipment parking yards. Pre-employment and routine medical examinations are given to all drivers as part of the process to maintain their legal driving licenses. Ergonomic and other health and wellness information is provided to drivers and office employees. Relevant occupational health and safety processes and procedures are documented in a driver's manual. The company is in possession of a "Certificate of Recognition" in Alberta and British Columbia, which confirms through regular review that it meets provincial standards for health and safety systems.

### **2.1.2 Operations**

Pre-trip inspections are carried out daily by the transportation equipment drivers. Route risk assessments are carried out prior to accepting new customer products and their pick/delivery facilities, with any issues being addressed prior to commencing with the operation. Worst case incident scenarios include vehicle crashes involving injuries, roll overs and product spills. All equipment repair and preventive maintenance is scheduled and tracked by the company and is outsourced to appropriate shops. Observations during a short site visit to a contracted tank trailer maintenance shop revealed a professionally managed operation. Tractor units are replaced every five years with preferred equipment manufacturers. The only fixed facilities are offices and owned or leased secure equipment parking yards, in British Columbia and Alberta. There is a defined process in place for the selection and set up of new yards. There is a documented management of change policy in place which addresses changes to processes, equipment, personnel and facilities. A Responsible Care related self assessment process is applied to new supply and service providers. Relevant operations health and safety processes and procedures are documented in the afore mentioned driver's manual.

#### ***Successful Practice***

- i. The use of video technology to support effective transportation route risk assessments.

## **2.2 Team Observations Concerning Environment**

The Environment Theme addresses the protection of the environment through the responsible management of all company operations along transportation routes and at fixed facilities.

Tractor unit engine exhaust emissions are the main source of environmental impact from company operations. Related vehicle operating parameters (e.g., fuel consumption, speed. etc.) are monitored by onboard computers, and fuel consumption is further optimized through routine servicing and the use of modern vehicle technology. Occasional spills during tank trailer loading and unloading also contribute to emissions. Hazardous wastes include washings from tank trailer cleaning and used oils. These are managed by contracted maintenance shops.

#### ***Improvement Opportunity***

- i. Establish and document a defined management system for greenhouse gas emission reductions.

#### ***Successful Practice***

- i. Participation in the "CleanBC Go Electric Commercial Vehicle Pilots Program", which supports organizations looking to deploy zero-emission commercial vehicles.



## 2.3 Team Observations Concerning Security

The Security Theme addresses the protection of people, property and information as it relates to all company operations along transportation routes and at fixed facilities.

A security vulnerability assessment was carried out when the company became a CIAC Transportation Partner, and a security plan is in place to provide a secure working environment. This includes procedures to control access to company facilities. Drivers are instructed on security awareness through established protocols, and all trucks are fitted with a panic button to be used in case of an emergency. When not in use, equipment is parked in secure yards, and the company standard is for no loaded trailers to be left unattended therein. Security procedures are in place related to computer systems and the information.

### ***Work in Progress***

- i. Ongoing activities related to enhancing information technology systems security

## 2.3 Team Observations Concerning TransCAER

The TransCAER Theme addresses the effective communication and two-way dialogue with those stakeholders who may be affected by or have an interest in company operations along transportation routes and at fixed facilities. It also addresses the protection of people, property, and the environment through response to emergencies as they relate to all company operations along transportation routes and at fixed facilities.

### 2.3.1. Community Awareness and Dialogue

The company's primary means of addressing community awareness and dialogue is through the CIAC Transportation Community Awareness and Emergency Response (TransCAER) program. The company is represented on the CIAC National TransCAER Committee. It is also represented on the BC and Alberta Regional TransCAER Committees, which co-ordinate a program of outreach to communities along transportation corridors in the region. The company regularly participates in community TransCAER events which typically include related workshops, awareness of chemical risks, emergency planning, first responder training, etc. Appropriate community activity support also takes place.

### ***Finding Requiring Action***

- i. Establish and document a process for community outreach at fixed facilities to include, but not limited to, identification of those who may be impacted by company operations/emergencies, what will be communicated, how and at what frequency will it be communicated, and keeping abreast as to how changes in the community may impact company operations [ref. Responsible Care Model for Transportation Partners, TransCAER, 1. Public Awareness].

### 2.3.2 Emergency Response

There is a documented emergency preparedness and response plan in place that addresses fixed facility and transportation operations. Response operations are provided through local municipal response organizations for fixed facilities, and contracted out to qualified responder organizations with appropriate equipment available and experience in on-scene incident management for transportation operations.

### ***Work in Progress***

- i. Developing a plan to prepare for, respond to, and recover from large scale emergencies that are above and beyond typical operational scenarios (ref. CIAC Business Continuity and Critical Infrastructure Guide).

## **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 CIAC Responsible Care Model for Transportation Partners.

The verification team studied the Northwest Tank Line Inc. management system and compared and contrasted the attributes of that system 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.

The plan step of the company management system addresses the establishment of annual objectives and targets with respect to control of hazards, regulatory requirements and standards, previous performance, and other relevant criteria. Objectives focus on continual performance improvement. Identification of employee skills and competencies to achieve the desired results is included.

### ***Successful Practice***

- i. The Health, Safety and Environment action planning, tracking and follow-up program.

### **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.

In the do step, the overall Responsible Care related management system is documented, defining the plan-do-check-act continual performance improvement cycle and the elements of each. The system elements are preceded by overall policy and governance statements. The system is supported by a detailed cross reference document that shows how each process in support of the management system is aligned with the Responsible Care Model. The system addresses responsibilities, rules, policies and

procedures, emergency response and training. The afore mentioned drivers' manual includes Responsible Care related information relevant to driving operations.

#### ***Improvement Opportunities***

- i. In the Responsible Care related management system document, some requirements are quoted as needing to be done "regularly". Consider making these more time specific.
- ii. In the Responsible Care related management system document, element 2.2 (Corporate Governance) specifically define what actual management meetings will occur.

#### ***Successful Practice***

- i. The entire Responsible Care related management system documentation and support processes (e.g., driver's manual, etc.).

### **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.

The check step of the company management system addresses the monitoring of Responsible Care related performance results and compliance with expectations. Performance versus objectives is regularly reviewed at management meetings. The afore mentioned Alberta and British Columbia health and safety Certificate of Recognition audits are carried out annually with appropriate follow-up. Through inspections and evaluations, and taking appropriate action, field safety personnel are assigned to focus on the wellbeing of the company's employees and equipment. There is a process for reporting all incidents, and a step by step incident investigation process is in place with follow-up action planning.

### **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 need 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.

The act step of the company management system covers regular Responsible Care related performance reporting and reviews. There is an employee and owner operator safety incentive program in place. Reviews of the overall Responsible Care Related management system are regularly done to determine its effectiveness in facilitating ongoing performance improvement.



## 4. Team Observations on the Responsible Care Ethic and Principles for Sustainability

Each CIAC partner 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 Northwest Tank Lines Inc. 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.

The company was seen to be appropriately aligned with the elements of the *Responsible Care Ethic and Principles for Sustainability*.

Related observations are as follows:

- *Work for the improvement of people’s lives and the environment, while striving to do no harm.*

Supported by a defined Responsible Care related continual performance improvement management system supported by detailed procedures and a clear personal commitment to safe and environmental responsible operations.

- *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 community awareness and dialogue processes through active participation in the CIAC Transportation Community Awareness and Emergency Response (TransCAER) program. There is however some work to be done in addressing community outreach activities for fixed facilities.

- *Take preventive action to protect health and the environment.*

Supported by a defined Responsible Care related continual performance improvement management system supported by detailed procedures and a clear personal commitment to safe and environmental responsible operations.

- *Innovate for safer products and processes that conserve resources and provide enhanced value.*

Supported by a modern fleet of vehicles operated and maintained by competent personnel, with a focus on efficient use of fuel and routine servicing.

- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*

Supported by a Responsible Care related assessment process that is applied to new supply and service providers.

- *Understand and meet expectations for social responsibility.*

Supported by community awareness and dialogue processes through active participation in the CIAC Transportation Community Awareness and Emergency Response (TransCAER) program, including local community support.

- *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.*

Supported by participation in CIAC committee work ( e.g., Leadership Group and TransCAER).

- *Promote awareness of Responsible Care, and inspire others to commit to the principles.*

Supported by a Responsible Care related assessment process that is applied to new supply and service providers.

## **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 verification is complete and no further involvement is required by the verification team.



## Attachment 1

### Company Response to Verification Team Report

On behalf of Northwest Tank Lines Inc. I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

Following our fifth successful verification, Northwest Tank Lines continues to value the Responsible Care partnership, and the value through the verification process. Northwest would like to thank the verification team for a productive and valuable audit process where we were able to proudly share policy, procedure, and actions that are actively progressing. While we are pleased to see our efforts taken to follow the Responsible Care Ethic recognized, we appreciate the thoughtful and useful opportunities and suggestions.

Northwest Tank Lines Inc. 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 partners. Plans will be developed and implemented to respond to the Findings Requiring Action and 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.

Kyle Porter

President

Northwest Tank Lines Inc.

July 22, 2022

## Attachment 2

### Interview Lists

#### A: Company Personnel

Name	Position	Location
Transportation Operations Representatives (3)	Drivers	Langley, BC
Kyle Porter	President	Calgary, Alberta
Michael Perry	Senior Advisor	Langley, BC
Tim Johnson	Director of HSE	Langley, BC
Trula Normandeau	Contract HSE Specialist	Langley, BC

#### B: External Stakeholders

Name	Company / Organization	Position	Location
N/A	Contracted Tank Trailer Maintenance Facility	Management representatives	Langley, BC



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