



**Chemistry Industry
Association of Canada**
canadianchemistry.ca

**Association canadienne
de l'industrie de la chimie**
chimiecanadienne.ca

On February 17, 2014 Kara Edwards and Louis Laferriere from the Chemistry Industry Association of Canada (CIAC) met with the Tanker Safety Expert Panel to discuss hazardous and noxious substances (HNS). This submission will reiterate and emphasize the points raised during that discussion.

The CIAC is the voice of Canada's \$49-billion chemistry sector. CIAC represents the interests of Canada's leading chemistry companies – from petrochemical, inorganic and specialty chemical producers, to bio-based manufacturers and chemistry-related technology and R&D companies. CIAC and its members are committed to working with governments, transportation partners and communities to further enhance safety, and to ensure that Canada has the strongest transportation safety standards in the world.

Canada's chemistry industry goes above and beyond Canadian laws related to the transportation of chemical products, including dangerous goods. As part of their commitment to Responsible Care® – the association's U.N.-recognized sustainability initiative – CIAC's members are required to choose the safest mode, route and carrier possible to move their products. CIAC verifies that each of its members and transportation partners is meeting Responsible Care's stringent safety requirements, by requiring independent, public verifications of these companies every three years, and by publishing the results on its website at www.canadianchemistry.ca/responsiblecare.

During discussion with the Panel, CIAC outlined the principles of Responsible Care and our efforts in preventing transportation incidents, including those related to HNS in the marine environment. While providing an overview of our membership and their products, it was also stressed that many chemical products are very different in nature, impact, and required response than those of oil, particularly in the marine environment. These differences must be acknowledged and factored into any spill response regime that is put into place. That is, different industry sectors will need to have different product-specific plans. For example, both methanol and petroleum are classed as TDG Flammable Liquids, Class 3; however, the spill response techniques are vastly different due to the wide difference in their water miscibility.

The CIAC discussion focused predominantly on the Association's experience in the establishment and continued evolution of the Transportation Emergency Assistance Program, version three (TEAP III). This program includes a standard which establishes minimum criteria CIAC member-companies must meet for road and rail emergency preparedness and response – including requirements for planning, administration, training, resource utilization and assessment. To support that standard the CIAC also engaged stakeholders in developing a second standard, the *TEAP III Transportation Emergency Response Service Provider Standard*, and assessment process for transportation on-scene service providers.

350, rue Sparks Street, Bureau/Suite 805
Ottawa, Ontario K1R 7S8
T: 613 237-6215



The purpose of this initiative is to maintain an identified emergency-response network with the capability and capacity to safely and efficiently respond, control, contain and remediate the impacts of a chemical transportation incident. Several program documents were shared with the Panel after our discussion and additional information on the program can be found at www.teap3.ca.

Some of the key findings from the program included challenges surrounding the stability of emergency response contractors, the importance of product-specific technical experts during an incident, and the collaborative efforts and sweat-equity by CIAC companies and industry partners that make the program possible.

Given the small number of “at-sea” marine chemical incidents, there is a paucity of experienced marine chemical responders in both the chemical industry and contract service providers. As there is limited response capability and capacity, the chemical industry predicts a substantial investment will be required in developing a reliable marine chemical response industry. This will likely not be of interest to private business (contract service providers) and therefore unsustainable unless there is significant government support.

The CIAC appreciates the opportunity to submit these comments and would be pleased to meet with the Panel again to discuss these points in greater detail.