



Chemistry Industry Association of Canada

Submission to the *Canada Transportation Act Review*

May 2015



CHEMISTRY INDUSTRY
ASSOCIATION OF CANADA

ASSOCIATION CANADIENNE DE
L'INDUSTRIE DE LA CHIMIE

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Introduction

The Chemistry Industry Association of Canada (CIAC) is pleased to have the opportunity to submit its comments and recommendations to the *Canada Transportation Act* (CTA) Review which was launched by the Minister of Transport on June 25, 2014. This is an important opportunity to undertake an in-depth analysis of federal transportation policy in Canada.

CIAC is the voice of Canada's \$53 billion chemistry sector. We represent 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. Canada's chemistry industry employs 81,000 Canadians directly, and supports another 400,000 jobs in the Canadian economy.

Two consecutive years of robust investment growth underscore that the investment climate in North America and Canada has improved dramatically from where it stood a few years ago. There had been almost no major new investments in the industrial chemical industry in Canada between 2000 and the recession. Since 2010 however, several significant new projects were undertaken and others are being considered.

Chemistry is critical to the Canadian economy

CIAC members produce goods that are needed everywhere; they are essential to Canada's economy and our quality of life. Among them, hundreds of dangerous goods are also manufactured and shipped across Canada daily, two examples of important chemical products are: chlorine, used to purify drinking water for millions of Canadians; and, sulphuric acid, used to manufacture agricultural fertilizers, synthetic fibres, batteries and pharmaceuticals (including chemotherapy drugs).

Safety is critical for Canada's chemistry industry

Safety is a top priority for Canada's chemistry industry, both at plant sites and along transportation routes. During the past 25 years, CIAC members have invested hundreds of millions of dollars in transportation-related research and upgrades; and have set the gold standard for transportation safety through the TRANSCAER® (Transportation Community Awareness and Emergency Response) and TEAP® III (Transportation Emergency Assistance Program) initiatives.

Canada's chemistry industry goes above and beyond what is required by Canadian laws related to the transportation of chemical products, including dangerous goods. As part of our commitment to Responsible Care® – the association's United Nations recognized sustainability initiative - CIAC verifies that each of its members and transportation partners is meeting Responsible Care's stringent safety standards, by requiring independent, public verifications of these companies every three years. These verifications reports are publicly available at www.canadianchemistry.ca/responsiblecare.

Rail is critical for Canada's chemistry sector

CIAC members depend on effective, efficient, low-cost rail service. Canada's chemistry industry makes more than two-thirds of its annual shipments by rail. In 2012, chemicals accounted for seven per cent of all Canadian rail traffic. For many chemicals, rail has proven to be the safest mode of transportation.

Access to reliable and competitively priced rail service is critical to the success of the Canadian chemistry industry. CIAC member-company executives now identify rail service as a key factor in deciding whether to locate a new facility or expand operations in Canada, second only to feedstock availability.

Chemical manufacturing facilities are generally located where there is easy access to raw materials, electricity and other resources. More than 70 per cent of the products shipped by CIAC members move by rail. There are several reasons for this. In some cases, these facilities have limited road access, making rail the only feasible option for moving chemical products.

Most importantly, however, when it comes to dangerous goods, rail is often the only option from a safety standpoint. For example, chlorine is moved uniquely by rail in Canada. Most chemicals are produced in continuous processes and with little option for storage meaning it is important railcars arrive and leave plants in a dependable and consistent manner. Not only can interruptions in rail service be particularly costly, they can be potentially dangerous when plants have to slow or cease operations temporarily.

CIAC's focus is on rail transportation

CIAC's submission to the CTA Review will focus comments and recommendations on rail transportation for freight.

The scope of the current CTA Review includes *"... provisions of the Act that are relevant to the transportation of grain by rail, and more broadly to the rail-based supply chain for all commodities. This will take into account the broader goal of a commercially based, market-driven multi-modal transportation system that delivers the best possible service in support of economic growth and prosperity."*¹

In reviewing the mandate of the Review, CIAC notes a key element is to address the *"...major global and national trends relevant to transportation, projecting freight capacity needs across the system, examining whether existing or planned capacity and performance improvements will be responsive to these needs and periodic demands for surge capacity, and advising on the possible steps to help ensure that the national transportation system has the capacity and nimbleness to support economic activity across all sectors over the medium- and long-term."*

Another is to focus on the *"...safety and well-being concerns related to rail transportation (including the movement of dangerous goods) through communities..."*

The CTA Review announcement concludes that *"...Transport Canada will then carefully consider the findings of the report and any actions that can further strengthen the safety, efficiency and competitiveness of Canada's transportation system."*

Since the last major review of the CTA, the Rail Freight Service Review's Final Report and passing of the *Fair Rail Freight Service Act*, we have seen major challenges, and arguably failures, in rail safety and service.

¹ *Canada Transportation Act Review Discussion Paper*

This submission presents some ideas and recommendations for consideration on rail transportation issues CIAC believes need to be addressed. These include:

- safety, efficiency and competitiveness;
- competitive access and service levels;
- capacity issues; and,
- investigative powers of the Canadian Transportation Agency.

Safety, efficiency and competitiveness are critical for CIAC, not only as they relate to the railways, but also as the railways meet the needs of CIAC members, which depend on these transportation services for their domestic, North American, and global supply chains.

Since this CTA Review was established, the government tabled Bill C-52, ***An Act to amend the Canada Transportation Act and the Railway Safety Act***. The chemistry industry's comments and recommendations to this Review are in the context of Bill C-52 coming into force as currently tabled.

Railway Safety

CIAC is one of the key industry leaders concerned with the Transport of Dangerous Goods (TDG). Bill C-52 will introduce new insurance requirements for railways operating in Canada. The legislation appropriately confirms third party liability, and compensation for railway accidents as the responsibility of the railways. Shippers will be required to pay into a compensation fund for some designated TDG products. For other TDG products, such as chlorine, the risk and cost of insurance has been demonstrated to be part of the higher freight rates for these products.

TDG products are essential to modern society, for example: clean, safe drinking water. Although the producers of these products do not control the destinations, nor can they even define all of the beneficial uses for their products, CIAC members have taken the lead to ensure their safe transportation to our communities. Rail is generally the safest mode to transport these products. Chemistry companies have accountability for preparation of rail cars at their sites. This combined with accountability by the railways for the transport of these products over their rail lines is the most effective way to ensure a safe transport system. Maintaining the railways' responsibility to do so safely is based on the requirements of the *Railway Safety Act*. Maintaining the railway's requirement to provide service is based on the level of service obligations of sections 113-115 of the *Canada Transportation Act*. These requirements must be maintained.

In recent years, railways have attempted to get out of their common carrier obligation by imposing terms and conditions that are very costly and/or impossible for shippers to meet. In recent years, CP has issued various versions of Tariff 8 (hazardous commodities) with new terms and increasingly stringent conditions for the carriage of Toxic by Inhalation Hazard (TIH) products including liability shifting and the setting of tank car requirements that are not within current North American standards. These conditions are currently being challenged at various court levels in Canada and the U.S., and are costly and lengthy processes.

Recommendation 1: Maintain the common carrier obligation and third party liability insurance requirements to underpin the changes brought by Bill C-52.

Efficient Operations

Efficient rail operations are essential to achieve the National Transportation Policy objective, *“transportation at the lowest total cost is essential to meet the needs of its users...”*²

A railway’s operating ratio is generally used to measure financial efficiency. This is one leading measure for efficiency. However, in order to increase their own productivity, railways have made decisions that do not necessarily benefit systems operations.

For example, reducing rail staffing, motive power, maintenance capital, or frequency of service intervals, can result in overall system cost increases due to service failures – causing their customers’ personnel, equipment, inventory or other costs to rise. The “lowest total cost” must include all these costs faced by other participants in the supply chain, other modes of transportation, terminals, and rail customers, in order to increase productivity.

The economic incentives to encourage investment in needed rail infrastructure are critical to achieving the multiple and interrelated safety, efficiency and competitiveness goals.

Recommendation 2: Develop full metrics to measure railway performance within broader supply chains.

Canadian Competitiveness

The challenges Canada’s exporters face spring directly out of the nature of Canada’s resource and value-added economic sectors. Primary resources such as agriculture, mining, oil and gas, forests and their manufacturing value-added sectors – petroleum, chemicals, lumber, metals and food -- are heavily dependent on an efficient, cost-effective rail freight transportation system.

As well, Canada’s economic growth depends largely on growing our export trade in these sectors. How much further we expand trade with the United States and the rapidly-developing economies in the Pacific Rim, South America and Africa depends directly on access to and efficient movement of primary and value-added Canadian products.

The nature of Canada’s exports is changing. Historically, Canada succeeded by exporting tonnes of basic commodities. Today, exporters thrive by creating sophisticated value chains to deliver their products to their customers, who increasingly demand the same high quality as the North American market. It is not a simple carload of a commodity, today our customers demand specific physical properties and logistics – when and how it gets there, that it is protected from contamination or damage, traceability... Exports are no longer simple commodities.

Given Canada’s difficult geography, the lack of alternative water shipping routes, and the nature of chemical products, they are going to be primarily shipped by rail. Growing export volume should

² National Transportation Policy Statement set out in section 5 of the *Canada Transportation Act*

certainly be an objective, but a more sophisticated product mix means exporters will need the railways to be supply-chain partners.

Canada's domestic market is relatively small -- 35 million people compared to a worldwide population of seven billion -- the future growth of a globally competitive Canadian industry will increasingly be dependent on the growth of international markets. Failure to create a transportation system which supports this will undermine Canada's prosperity.

Productivity can only increase when participants in the entire supply chain are able to make their individual business decisions on the basis of their contracts with their partners and the reasonable expectation that the terms of their contracts will be met. The railways' service levels must be measured against their customers' needs.

Industry must build complex global supply chains to establish competitive advantages in international markets, to meet their unique business objectives.

Canadian economic growth and prosperity requires increasing investment and international trade. Rail transportation must be an active participant in continuing to improve our access to global markets.

Recommendation 3: The railways must be held accountable to the commercial standard of meeting the terms and conditions of their contracts, or arbitrated agreements, with their freight customers and provide service that enables their customers to prosper in their markets.

Railway Service 2008-2015

CIAC is of the view that the rail freight market is not a functioning competitive market. In Canada, it is a dual monopoly. This is the fundamental issue underlying all the price and service problems encountered by our members.

While CIAC members work to solve problems with the carriers through direct negotiation, where the lack of competition prevents working out a solution (such as in the case of rail transportation), some form of regulatory rebalance is needed.

We believe that the response of the Government in undertaking the Rail Freight Service Review and moving forward by one year this CTA Review, is an indication that problems do exist and that rebalancing is necessary.

2008 to 2011

At the time Parliament was considering Bill C-8 amending the *Canada Transportation Act*, CIAC strongly advocated that the Government undertake an independent review of railway service. CIAC members were pleased when the Government accepted this recommendation. Bill C-8 received Royal Assent on February 28, 2008 and the Government commenced the review.

The railway industry is essentially a dual monopoly, characterized by two major railways, CN and CP augmented by 49 short line railways which handle traffic to and from the two main line carriers.³ We characterize this as a “dual monopoly” rather than a “duopoly” as both CN and CP are the only significant rail carriers in some parts of the country and many member shippers are served by only one carrier. In the Canadian rail freight market, CN and CP together control over 90 per cent of rail freight revenues.

The issue of competition from other modes is a factor to be considered and is often raised with regard to rail freight. While in some instances, there may be truck and marine competitive options, for our membership moving to other modes in most cases is not feasible. From both cost and congestion perspectives, trucking is not a competitive option for many of our products. For more hazardous products, rail represents the safest mode of transportation. Finally, CIAC members also believe that rail movement of our products is more environmentally responsible.

As previously noted, despite the last major review of the *Canada Transportation Act* and the subsequent Rail Freight Service Review's Final Report, and the legislation, the *Fair Rail Freight Service Act*, we have still seen major challenges, and arguably failures, in rail safety and service.

Post-2011

Since the *Fair Rail Freight Service Act*, in 2013, Bill C-30, An Act to amend the *Canada Grain Act* and the *Canada Transportation Act*, in 2014, added other measures, in force until July 31, 2016:

- Gives shippers in the three Prairie provinces more rail options by extending interswitching rights through regulations to 160 kilometres for all commodities.
- Strengthens accountability between shippers and the railways ... (commodity supply-chain tables).
- Allows shippers to be directly compensated for any expenses they incur as a result of the railways' failure to meet their level of service obligations under the *Canada Transportation Act*.

In addition, the CTA has established the Regulations on Operational Terms for Rail Level of Service Arbitrations (Appendix 3), thereby making it clearer how to define ‘suitable and adequate service’ in a Service Level Agreement. Shippers are now entitled to:

- Negotiate a Service Level Agreement, and ask for defined Operational Terms.
- File a level of service complaint asking the Agency to order the railway to compensate the shipper for its expenses caused by a breach of the level of service provisions of the *Canada Transportation Act*.

These new mechanisms have given shippers the ability to require adequate and suitable accommodation but have not strengthened or clarified the legislated obligations of the railways as written in the Act.

Commercial remedies are required to ensure that the railways’ ‘suitable and adequate service’ is sufficient to meet the needs of modern-day supply chain partners. Although advances have been made, CIAC members view this as a partly completed task.

³ As noted in the QGI consulting report, 2(b), “Description of Canada’s Rail Based Freight Logistics System”,

Competitive Access

Rail customers need to be able to tailor their rail transportation systems to meet their business strategies and their customers' needs.

Regulations allowing a shipper to access an alternative rail carrier can support efficient access to their customers, whether within the historical 30 km interswitching limit, using the new limited (in both regional application and time) 160 km interswitching limit, or establishing a workable Competitive Line Rate (CLR).

However, the CLR has been rendered ineffective due to a clause requiring a shipper to have an agreement with the connecting carrier prior to using this competitive access provision. Much has been said regarding the flawed CLR during past CTA reviews. For example, the Final Report of the National Transportation Act Review Commission, January 1993, Vol. 1, page 131, which states in part that "...CN and CP have effectively declined to compete with each other through CLRs, and as a result the provision is largely inoperative in Canada". Removal of the "agreement" requirement is generally viewed as the straight-forward solution.

The option to extend interswitching to the first interchange is partly accomplished by the new 160 km Prairie interswitching limit. CIAC proposes this new provision be made permanent and expanded to the first interchange for all shippers, and that it apply throughout the country.

The overriding objective needs to include the ability of shippers to reach an alternative rail carrier for all of their moves. This would permit the rail customer to at least engage in negotiations, recognizing such negotiations will always be bracketed by the restricted competition natural to the rail system.

Recommendation 4: Establish effective regulatory access to alternative rail carriers; one, remove the prior agreement provision, two, expand interswitching to the first interchange for all shippers, and finally, make the existing interswitching limit permanent and make it applicable throughout Canada.

Reciprocal Commercial Incentives

The railways' customers cannot ask for the Arbitrator to establish contractual terms for effective accountability and continuous performance improvement as part of their Service Level Agreement (SLA). It is vital to ensure that the Operational Terms of the SLA have reciprocal commercial incentives, that is, financial incentives to ensure accountability to the SLA and commercial repercussions within the terms of their contracts. This is critical to achieving an effective, enforceable definition of 'suitable and adequate'.

Effective railway service generally includes the following elements:

- At origin, on-time delivery of specific empty cars for loading, prompt pick-up as per schedules – both at the rate required by the shipper. Most CIAC members either own or lease cars, and many are specialized and specific to individual products. Also, many chemical production processes are continuous and a failure to receive timely service will result in a plant shut-down to manage inventories.

- Consistent, reliable transit times, whether the shipment is handled by a single railway or interchanged to one or more other railways. The Canadian chemistry industry competes globally and exports most production to the U.S. markets, where there are alternatives to sourcing from Canada. Delays in turnaround times requiring more cars and late pick-up, even of returning empties, can result in lost business or even, in the extreme, the shutdown of plant operations.
- At destination, on-time delivery of loaded cars to the consignee delivered at the rate that the consignee needs.
- Prompt pick-up of cars once emptied.
- Accurate billing. It costs money and time to correct railway mistakes.
- Accurate assessment of demurrage based solely on shipper or consignee delays and not due to delays caused by the railway.
- Attentive customer service and communication with customers on service problems.

There are some unique and sector-specific points within the above-mentioned elements that need to be highlighted. First, it will be difficult to entirely separate service issues from rates issues. For example, a significant portion of chemical rail traffic involves dangerous goods. Soaring freight rates and multiple accessorial charges are one way railways are trying to get out of carrying these products and avoid the common carrier obligation provisions of the Act. Rail is the safest way to move more dangerous products and CIAC members already incur high costs as we develop and pay for specialty cars for various products. Very few products are consumed at a retail level and most are key inputs into other sectors, often far from where they are produced.

Shippers require access to reasonable rail rates for both captive and competitive rail movements. Without the ability to benchmark against market rail rates, a safeguard is required for captive shippers that, on average, pay more to transport commodities.

On-time car delivery is also an extremely important point. Many products are delivered into sectors where reliable delivery is a necessary contractual component and maintains competitiveness. Turnaround times are increasingly becoming an issue with CIAC members. Longer transits require the leasing of much larger fleets – further adding to congestion, and also requiring more on-site trackage/sidings – with added cost and impacts on competitiveness. Service failures are clearly not the sole domain of shippers, yet ancillary charges are very much a one-way issue.

The limitation that Operational Terms do not include the ability to negotiate or arbitrate reciprocal commercial incentives to establish accountability for service failure, in order to meet SLA terms, removes a significant economic lever from rail customers. Alternatively, the railways have the freedom to establish their own incentives should the customer fail to meet their requirements, through ancillary charges contained in tariffs. The railways have consistently justified new and increasing ancillary charges as an effective tool to ensure their customers' compliance with operational terms established by the railways.

The announced policies, providing for compensation for expenses due to rail service deficiencies or failures, make good progress in the goal of securing service contracts which are enforceable: “Allows shippers to be directly compensated for any expenses they incur as a result of the railways' failure to meet their level of service obligations under the *Canada Transportation Act*” and shippers' ability to “file a level of service complaint asking the Agency to award expenses due to a service failure.”

However, the shipper can be compensated only for out-of-pocket expenses caused by the railway's failure to provide adequate and suitable service, and the shipper would have to substantiate the expenses with a claim for expenses. The only route for this relief is to file a Level of Service (LOS) complaint under s. 113.

The root of the problem is the fact that the railways have been statutorily granted tariff-making power without prior regulatory oversight, and that the legislation makes the railways' tariff rates legal until struck down following a complaint or other application under the Act.

Litigation tends to be protracted, causing inordinate delays and excessive costs, most shippers decline to go that route, so that effectively the railways' tariffs go unchallenged. This unfettered tariff-making power is an extraordinary advantage that works to the disadvantage of shippers. There is no corresponding power for shippers to reciprocate.

Recommendation 5: Require the railways to have the discipline of contractual terms for effective accountability and continuous performance improvement, establishing reciprocal commercial incentives through ancillary charges, contracts, or arbitrated agreements, within the terms of the Service Level Agreement (SLA).

Railway Capacity

In its annual publication, *Rail Trends*, the Railway Association of Canada reports growth of 29 per cent in revenue ton-miles (revenue tonne-kilometre) during the past decade (i.e. from 235 billion RTM in 2004 to 291 billion in 2013).

Just as the nature of chemical exports has changed, so has transportation. The rail system is not a state-owned, state-subsidized or state-directed system – nor can it be anymore. The public policy direction during the last 25 years has been away from public ownership and investment in Canada's transportation infrastructure as witnessed by: the sale of the railways, ending subsidies, deregulation of trucking freight rates and railway confidential contracts, and the commercializing of the port authorities as public corporations.

These put transportation infrastructure investments under a new lens – do they provide an adequate return on investment? While the railways invest in infrastructure capacity and equipment, there is mounting evidence that parts of the railway network are having difficulty recovering from service outages due to natural causes, derailments, short-term or unexpected surges in demand, or work stoppages. The drive to improve railway operating ratios has limited flexibility beyond the level desirable to meet the public interest objectives that support Canada's investment, employment, international trade and our national transportation policy

Railways have been granted a great franchise by our society, a privately owned right-of-way and, historically, a publically-funded capital base. The railway system needs to invest in the network in order to have the resilience to recover from outages quickly and to meet the forecast growth for rail service. Today, railways are private corporations, accountable to their shareholders for their profitability.

We need to recognize that transportation infrastructure is a combination of private and public enterprises; government has an active investment role in some areas, at other points it needs to focus on ensuring there is a supportive economic and regulatory framework.

Recommendation 6: Ensure investment is driven by real world commercial incentives. This CTA Review should consider the need for, and potential sources of, capital investment in our essential rail infrastructure.

Canadian Transportation Agency Investigative Powers

Currently, the Agency can only carry out investigations pursuant to complaints filed by shippers or, in some cases, by other stakeholders. Railway customers are often reluctant to bring complaints forward because of the costs, an uncertain outcome, and the potential for retaliation against customers who have no alternative transportation options.

Where the Agency sees trends in problems or anecdotal complaints, the Agency should have the authority to undertake investigations on its own initiative. The Agency had the authority to identify and investigate such trends until amendments to the CTA in 1996 eliminated this. The recent major challenges and failures in rail safety and service bring forward the need for a return of this authority.

To support an investigative mandate, the Agency should establish a continuing monitoring function to:

- a) establish service standards;
- b) have the authority to collect and publish data from the railways and others in the supply chain;
- c) issue periodic public reports;
- d) impose penalties and award compensation where appropriate.

This authority would be of tremendous benefit to shippers in accessing Agency services and remedies. For example, the deck is stacked against shippers when it comes to arbitration proceedings; the railways have data on all their customers, commodities, shipments, equipment supply/availability, service etc. whereas shippers for the most part only know about their own businesses.

Recommendation 7: Empower the Canadian Transportation Agency with the mandate to initiate, investigate and address systemic shortfalls in rail service, capacity and infrastructure, and to aggregate, publish and maintain related data.

Conclusion

An assessment of the recent legislative initiatives required since the CTA 2008 Review demonstrates that there are serious challenges facing the freight rail transportation system.

This CTA Review is an opportunity to take a fresh look at how to integrate and balance the key separate and interrelated priorities – safety, efficiency, and competitiveness.

The CTA Review needs to identify market-based solutions to encourage investment in rail infrastructure and capacity, while strengthening the commercial backstop needed to ensure the railways meet their contractual commitments to their customers.

Canada requires a commercially based, market-driven rail freight system. The recommendations in this submission are intended to accomplish those goals, where deregulation has failed. These adjustments to the current transportation legislative and policy framework are required to support Canada's international competitiveness, trade interests, and economic growth and prosperity.

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Appendix 1: List of CIAC Recommendations

Recommendation 1: Maintain the common carrier obligation and third party liability insurance requirements to underpin the changes brought by Bill C-52.

Recommendation 2: Develop full metrics to measure railway performance within broader supply chains.

Recommendation 3: The railways must be held accountable to the commercial standard of meeting the terms and conditions of their contracts, or arbitrated agreements, with their freight customers and provide service that enables their customers to prosper in their markets.

Recommendation 4: Establish effective regulatory access to alternative rail carriers; one, remove the prior agreement provision, two, expand interswitching to the first interchange for all shippers, and finally make the existing interswitching limit permanent and make it applicable throughout Canada.

Recommendation 5: Require the railways to have the discipline of contractual terms for effective accountability and continuous performance improvement, establishing reciprocal commercial incentives through ancillary charges, contracts, or arbitrated agreements, within the terms of the Service Level Agreement (SLA).

Recommendation 6: Ensure investment is driven by real world commercial incentives. This CTA Review should consider the need for, and potential sources of, capital investment in our essential rail infrastructure.

Recommendation 7: Empower the Canadian Transportation Agency with the mandate to initiate, investigate and address systemic shortfalls in rail service, capacity and infrastructure, and to aggregate, publish and maintain related data.

Appendix 2: CIAC Member-companies

Akzo Nobel Chemicals Ltd
Argex Titanium Inc.
Axiall Canada Inc.
BASF Canada
BioAmber Inc.
Canexus Corporation
CCC
Chemtrade
Chemtura Canada Co./Cie
Cytec Canada Inc.
Dow Chemical Canada ULC
E.I. du Pont Canada Company
ERCO Worldwide
Evonik Canada Inc.
Evonik Oil Additives Canada Inc
H.L. Blachford Ltd.
Honeywell ASCa Inc.
Imperial
INEOS Canada Partnership
Jungbunzlauer Canada Inc.
KRONOS Canada, Inc.
LANXESS
MEGlobal Canada Inc.
METHANEX CORPORATION
Nalco Canada ULC (An EcoLab Co.)
National Silicates
NorFalco Sales Inc. (A GLENCORE Company)
NOVA Chemicals Corporation
Olin Canada ULC
PCAS Canada inc.
PeroxyChem Canada
Pétromont Inc.
Shell Chemicals Canada
Solvay Canada Inc.
Stepan Canada Inc.