

Safety Moment
How to make sense of
your Data
(8 Sep 2022)

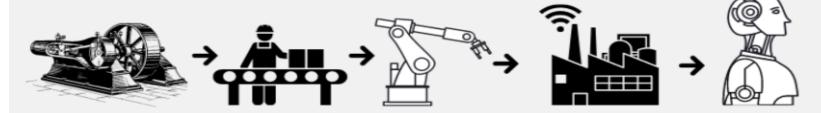




# Industrial Revolutions History (Industry 1.0 – 5.0)



# Industrial REVOLUTIONS



#### Industry 1.0

mechanization, water and steam powers

1800

#### Industry 2.0

mass production, electric power, assembly line

1900

#### Industry 3.0

computers, automated production, electronics

2000

#### Industry 4.0

cyber-physical systems, IoT, networking, machine learning

2010

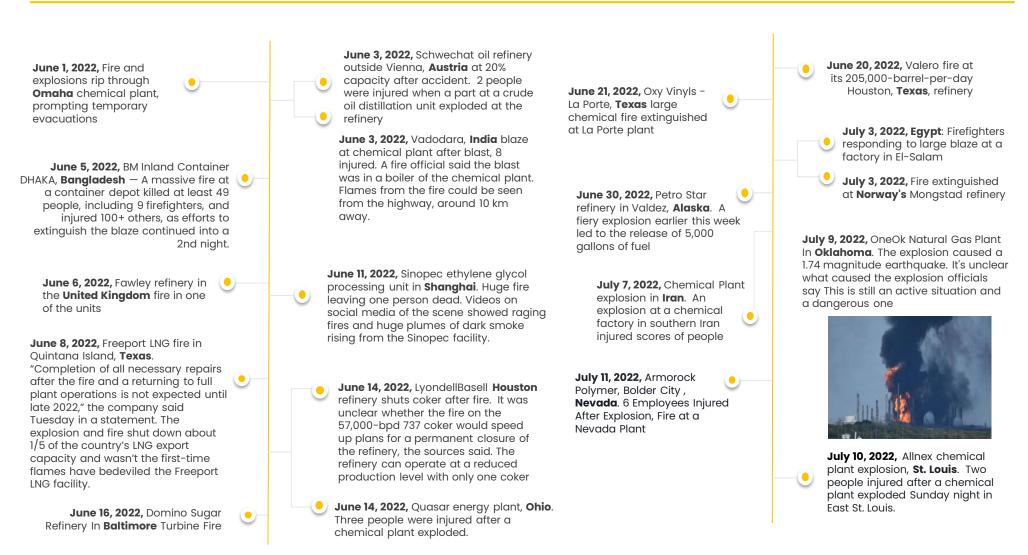
#### Industry 5.0

human-robot collaboration, cognitive systems, customization

2020

https://knowhow.distrelec.com/manufacturing/is-your-business-ready-for-industry-5-0/

# International News Events (Jun 1-Jul 10, 2022) Average = 1 major incident/ 2 days



### Hydrocarbon Process Industry ESG Issues

- Eliminating industrial accidents will cut industrial greenhouse gases by 46%
  - Normal industrial processes make up 6% of all man-made greenhouse gases
  - Fugitive Emissions from incidents add almost the same amount (an additional 5.2%)
- Industrial Insurer Marsh McLennan reports that major industrial accidents have not improved in last 30 years
- Risks are not monitored using quantitative methods
- Current Operational risks are not monitored, prioritized and managed with a closed loop system
- Leading Indicators are not closely managed
- Current methods miss the dynamic nature of risk



### Case study: Plant Air System Failure

#### Executive Summary

On 3/26/2020, loss of Plant Air System (Unit 08 in Area 2) and failure of Emergency Air Supply control valve to actuate caused a Refinery shutdown.

#### nvestigation Findings

- Welding rod found inside V-9 Depressure Valve on Air Dryer. Not the first time welding rods have been found in lines at Unit 008 Plant Air System.
- Employees left the air system (Unit 8) when told the FCCU and Boilers were shutting down.
- Preventive maintenance had never been performed on A and B Dryers, but the desiccant on A Dryer has been replaced.

If the last 355 days to date (leadings taken once per sinit), 7 instances of critically high dew point on A Dryer (>50°) and 50 Caution (>20°). This was recorded by personnel on their handheld device. On B Dryer, 3 Critical and 17 Caution pagings.

Preventive maintenance had never been performed on 08-PC-1016 the Emergency Air Supply control valve. It was sticking when they tried to manually stroke it.

- The Emergency Air Supply System had never been hooked up because the plant air and yard air subsystems had never been separated and isolated in Area 2.
- Preventive maintenance had never been done on Plant Air Emergency Shutdown valve XV-1016 that, in an air system failule, stops plant air flow so that all air flow goes to instrument air system. It was stuck in the open position. WC#409039 written 8/2/2017 to segregate instrument and piping at FCCU not completed. MOC #2017-0885-013 for filis WO was cancelled.

Work Monitoring - Leadership System LTA (Interconnection of yard & plant air

in Area 2 and non-commissioning of Emergency Air Supply system not reported

Work Monitoring - QA/QC LTA (Welding rods found in Plant Air System lines)

Knowledge and Skills - No or Inadequate Training (1. Operating Air Dryer

with high dew points. 2. Leaving air system (Unit 8) to respond to FCCU and

OOT CAUSE ANALYSIS (RCA)

ONTRIBUTING CAUSE(S):

OOT CAUSE

to Management)

Boilers shutdown)

#### **Timeline & Key Factors**

#### **Pre-Incident**

#### **During Incident**

 5/26/2016, 8 initial operating procedures developed for Air System. No Emergency, Environmental, and Safety & Health procedures were written. The

procedures have never been

· 1/15/2017 the New Refinery Plant

& Instrument Air System goes on

System was not hooked up and

commissioned because the plant

never been separated and isolated

air and yard air subsystems had

FCCU slide valves in Area 2 are

actuated by plant air instead of

8/2/2017 WO# 409039 was written

to separate systems, but never

completed. MOC for that WO was

line. But the Emergency Air Supply

updated.

 Although an Employee switched to B Dryer, the air pressure was still dropping.
 The Employees left the air system to help stabilize FCCU and Boilers that were shutting

"A" Dryer was flooded due to

high dew points and the V-9

Depressure Valve was open.

- The Emergency Air Supply control valve 08-PC-1016 failed to open.
- Plant Air Emergency Shutdown Valve XV-1016 stuck open and failed to close.
- Loss of the Refinery air supply caused a cascade affect shutting down the Boilers and all process units.
- At 3/26/2020 6:19 pm, low air pressure triggered the second, B compressor to start.

instrument air .

#### Post Incident

 When the Employees returned to the air system, one had to open the bypass - 08-PC-1016 to get sufficient seal air pressure to start compressors and restore air pressure by ~7 pm.



#### Recommended Actions to Prevent Reoccurrence

- Repair/PM Dryers M. McAlistel WO#555768, WO#555774, WO#555171 Planning/Scheduling – 5/15/2020
- Reconfigure and Repair PC-1016 M. McAlister WO#555773
- Develop, Review, and Train on Plant Air System Procedures R. Small 6/30/2020
- Complete WO#409039 to isolate Plant & Instrument at FCCU Turnaround scheduled
- Write WO to connect Emergency Plant Air System reading from the compressors to DCS and commission on sile WO# 556468, WO# 558100, WO#558101
  Repair V-9 Valve M. McAlister WO#555399 Completed

  Repair V-9 Valve M. McAlister WO#555399 Completed

  Repair V-9 Valve M. WcAlister WO#555399 Completed

  Repair V-9 Valve W. WcAlister WO#555399 Completed

  Repair W-9 Valve W. WcAlister WO#555399 Completed

  Repair W-9 WcAlister WO#55599 Completed

  Repair W-9 WcAlister WO#5599 Comp

In the last 365 days to date (readings taken once per shift), 17 instances of critically high dew point on A Dryer (>50°) and 50 Caution (>20°). This was recorded by personnel on their handheld device. On B Dryer, 3 Critical and 17 Caution readings.

# Plant Air System Failure Unplanned Shutdown

March 2020

- All process units shutdown
- Loss of production
- Increased risk from startup
- Repair costs

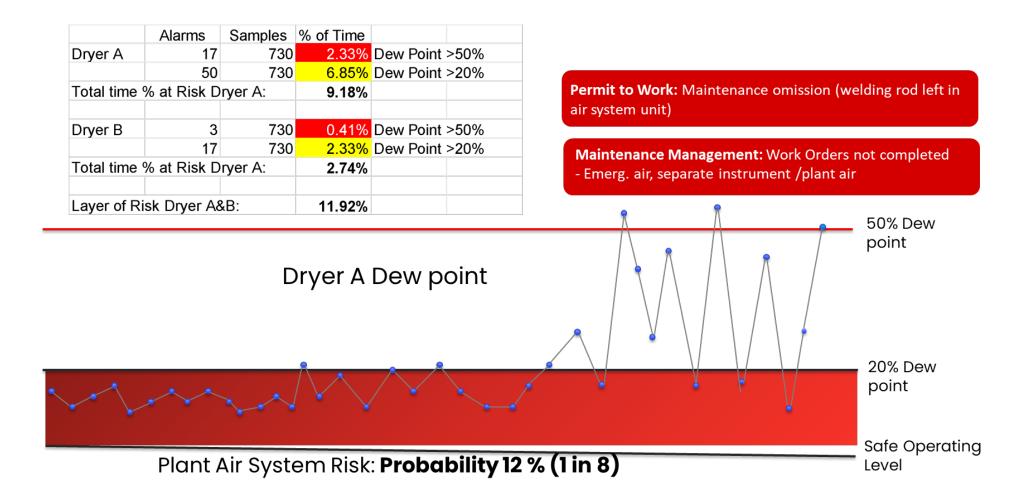
#### Plant Air System Failure

Operations: Dryer Dew Point too high

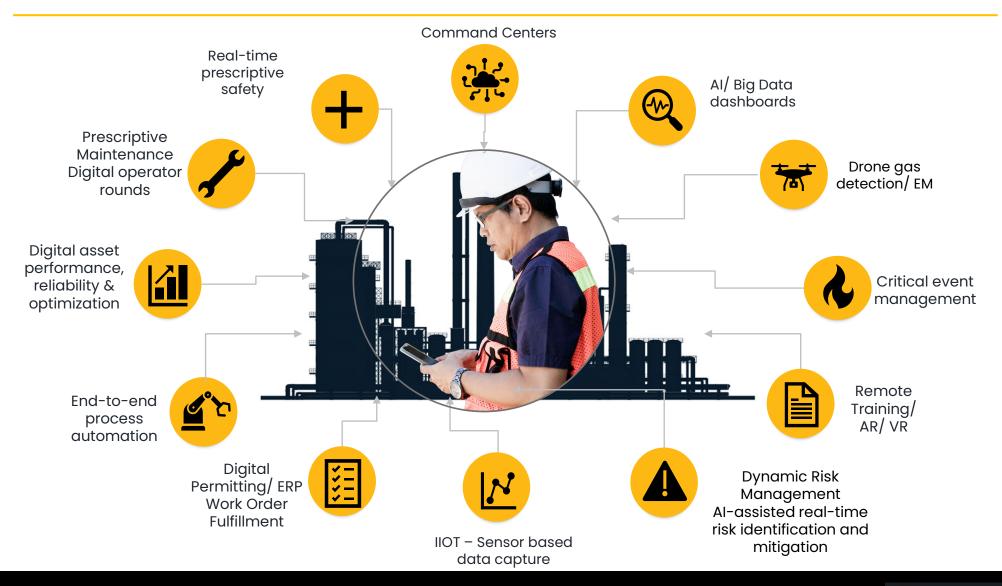
Maintenance: Uncompleted air system work orders



### Case study: Plant Air System Failure



### Today's Connected World







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# **CSChE – PSMD why? History**

Bhopal, December 2 to 3 1984 water entered tank 610 causing a runaway reaction with MIC From CSB's e-mail of Dec 2, 2014:

An estimated 3,800 people died immediately, and tens of thousands were injured. Eventually thousands more died from toxic gas-related illnesses – the release eventually killed tens of thousands of people







### **Bhopal aftermath**

 CCPS was created as a division of the American Institute of Chemical Engineering shortly after the disaster:

### From Abstract of Process Safety Progress of the AIChE:

Leaders from the chemical industry asked AIChE to lead a collaborative effort to eliminate catastrophic process incidents by advancing state of the art technology and management practices, serving as the premier resource for information on process safety, supporting process safety in engineering, and promoting process safety as a key industry value. In the spring of 1985, CCPS was founded.







## **Bhopal aftermath in Canada**

- In 1985, there was no interest in Canada to create a Canadian PSM initiative
- 1989, MIACC was created: Major Industrial Accident, this lead to the: Risk Assessment Guidelines for Municipalities and Industry
- CCPA had their own PSM initiatives, which lead to Responsible Care ®.







### **CSChE - PSMD**

In 1999, MIACC was disbanded, Gerry Phillips approached the board of directors of the CSChE (Paul Amyotte was the president), and the PSM subject Division was created (PSMD), first meeting in Halifax







### **PSMD** Activities

- The PSMD is made up of volunteers, not companies
- Since it's inception the PSMD has published many documents;
  - The 4<sup>th</sup> edition of the Process Safety Management Guide served as the seed document for the CSA Z767 PSM Standard
  - The section 200 of the Canadian Environmental Protection Act was developed under CSChE
  - More recently, the PSMD has worked with the Canadian Energy Regulator for the Onshore Pipeline Regulations (OPR) discussion paper for the update of the regulations
- Currently working on:
  - Canadian Environmental / Ecological Risk Assessment Guideline
  - Canadian QRA Guideline with tolerability criteria





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# Risk Assessment white Paper

- Focus: Acute hazards fires, explosions, toxic gases
- Purpose:
  - Describe risk assessment types used in Canada
  - Describe when and how each risk assessment type should be used
  - Recommend risk evaluation criteria for each RA type
- Why:
  - Lack of a consistent pan-Canadian approach viz. risk assessment
  - Non-alignment among risk evaluation criteria
  - Documenting the basis so that process safety engineers understand "why"
- Who: task force of subject RA specialists and regulators
- QRA Guideline will then be developed using White Paper as a seed document





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# **Risk Assessment – Current Situation**

Risk assessment type	Type of risk estimated	Risk Evaluation	Known Users
QRA – aggregate risk: ALARP Principle	Individual specific individual risk (ISIR)	ISIR thresholds	British Columbia – LNG reg Ontario – Operating Engineers reg CSA: Z276, Z662
	Societal risk (SR)	FN Curves	British Columbia – LNG reg CSA: Z662
QRA – aggregate risk: Geographic risk	Location specific individual risk (LSIR)	Land use planning guidelines (MIACC)	Quebec – CRAIM Ontario – Propane
PHA	Single scenario	Risk matrix	Companies (e.g., HAZOPs) Worksafe BC





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### Risk Assessment - Some Known Issues

#### Risk evaluation:

- ISIR thresholds solid basis already describe the basis
  - Anchor point for all other criteria
- FN curves: defend the basis for the emerging criteria (BC, Z276, Z662); slope of the curve (-1 or > -1)
- Land use (MIACC) guidelines greater clarity on the land uses for each category required
- Risk matrix will try to develop a single risk matrix linked SR thresholds for all to use
- Public risk vs. worker risk
- Risk assessment
  - Incorrect use e.g. Ontario uses LSIR land use guidelines for ISIR estimated risk
  - Risk assessment approach for public risk / major consequences
  - Justification of ALARP qualitative vs. quantitative when / why





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# **PSMD**

Presenter

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# **CSA Z-767**

Update, September 8, 2022

# Why a Canadian PSM Standard

- Canada has Federal and Provincial legislation on labour, safety and environment - this means 14 different regulatory regimes
- There can not be one "National" PSM regulation due to the constitution
  - India and Australia have similar legal issues
- A "National Standard" allows the various regulators to refer to one common standard, without requiring 14 different pieces of legislation - and that makes it easier for implementation, especially for firms with operations in multiple provinces

# **Background**

- CSA Z-767 technical committee started work in February 2015
- The standard was issued in 2017 as a National Standard of Canada

The standard was re-affirmed in February 2022

### Revisions

The TC is working on revisions - essentially 3 types

- Simple adding definitions, minor wording changes
- Simplifications several clauses have similar requirements reduce the requirements to one clause which makes auditing easier
- Complex Issues How to better describe the scope and goals this is slow work and requires much reflection

### **Process Safety Management Framework (CSA Z767)**

1) Accountability	5) Process Knowledge and Documentation	9) Training and Competency	13) Investigation
2) Regulations, Standards, and Codes	6) Project Review and Design Procedures	10) Management of Change	14) Audits Process
3) Process Safety Culture	7) Process Risk Assessment and Risk Reduction	11) Process and Equipment Integrity	15) Enhancement of Process Safety Knowledge
4) Conduct of Operations	8) Human Factors	12) Emergency Management Planning	16) Key Performance Indicators
Pillar 1	Pillar 2	Pillar 3	Pillar 4
Process Safety Leadership	Understanding Hazards & Risks	(Residual) Risk Management	Review and Improvement

### **Process Safety Management Framework (CSA 2767)**

The company and workers take responsibility for safety, make safety their top priority, and demonstrate this commitment through their actions and resource commitment.

Management and workers at all levels understand the hazards of their operations, the risks they pose, and understand why and how these risks are being managed. Efforts should look at both equipment and human factors that impact risk.

Processes are in place to ensure that risks are adequately addressed and are continuously managed. This is especially important as worker knowledge wanes, processes change, and equipment age.

Metrics and systems are in place to measure the company's process safety performance, reflect on experiences, learn from mistakes, and continuously improve the PSM program.

Pillar 1

Pillar 2

Pillar 3

Pillar 4

Process Safety Leadership **Understanding Hazards & Risks** 

(Residual) Risk Management Review and Improvement

# What Organizations are Covered?

- The UK, Europe and US have legislation that defines who must have PSM
- Organizations outside of the legislation also would benefit
  - Mining, chemical repackaging, municipalities, transportation

 How do we best explain this? Especially to people who are not tuned in to PSM.

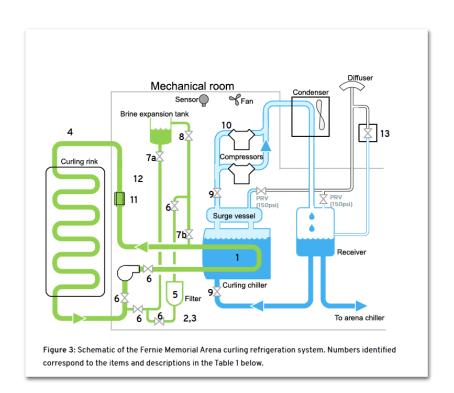
# Sayano-Shushenskaya dam (2009)

- Extended operation outside of the defined operating window, and in a region of elevated vibration
- blew turbines out of station
- 75 fatalities
- Loss of 6400 MWe production



# Fernie, B.C.

- Ammonia refrigerant leak in a hockey arena/curling club
- Old equipment that had known leak issues, but had not been replaced
- 3 fatalities



# **Transportation**

- Lac Megantic, 2013
- 47 fatalities
- Underinsured short-line railroad
- Unattended train on main line
- Insufficient handbrakes, coupled with loss of air pressure for brakes



### **Common Risk Matrix**

Risk matrices are a common communication tool (now in IT!)

- Smaller businesses usually have smaller consequence values
- But, the enterprise value is much lower as well

 Can one have a common risk matrix - and also communicate the maximum risk that an enterprise can accept, leading to where maximum attention is needed?

# **Our Request**

- For those who have a PSM system
- Can you provide suggestions for improvements in the standard

 What are the clauses with which you have difficulty - perhaps with auditing, or perhaps with understand

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### AON

Overview and the Impact of Environmental, Social and Governance (ESG) on the Canadian Insurance Industry

September 8, 2022

Frank Verbeek



Environmental, social and governance ("ESG") refers to non-financial risks and opportunities associated with a company or industry



### Why Does ESG Matter?

Investors - Investors are increasingly active on ESG issues to address non-financial risks to mitigate volatility

**Insurers** - Understanding ESG risks leads to better underwriting and less risk of loss, protection of social license to operate & investment capital

Employees - Companies with strong ESG credentials decrease turnover and increase productivity

Social License to Operate - Making products and doing so in a way that resonates with consumers is increasingly important

**Regulatory Bodies & Disclosure Regimes -** An increasing number of regulatory bodies and disclosure regimes are pushing companies to embrace ESG



### **ESG - A Growing International Imperative**

2,000+

Studies that show positive correlation between ESG and corporate performance 900+

Number of material ESG factors according to the Sustainability Accounting Standards Board 400

Out of 2,000 of the largest global companies have committed to Net Zero

85%

of S&P 500 companies producing meaningful ESG disclosures and/or sustainability reports

650

Number of mandatory and voluntary ESG regulations/ disclosure regimes globally

175

CEOs committed to the CEO Action for Diversity and Inclusion The need to address ESG grows daily, with companies taking action around the globe



### **ESG & Insurers**





### ESG: What to Expect for Future Renewals

Properly showcase sophistication on ESG oversight, practices, and disclosures, a company must first know its exposure relative to:

- The constantly evolving legal & regulatory landscape;
- External stakeholder expectations;
- Competitive market practices & performance relative to peers



# AON

# Aon's Energy ESG Performance Index



# Leveraging data & analytics capabilities Aon's ESG Performance Index

#### **Primary Goals**

- Gain a better understanding of each client's approach to the evolving ESG framework
- Support the underwriting process
- Access new or maintaining capital
- Consultation tool

#### **Secondary Goals**

- Track ESG progress over time (trending) insurance policies responding based on ESG performance
- Connect to claims, risk factors, Nat Cat and other data sets through ORCA for deeper risk insights

#### The Module

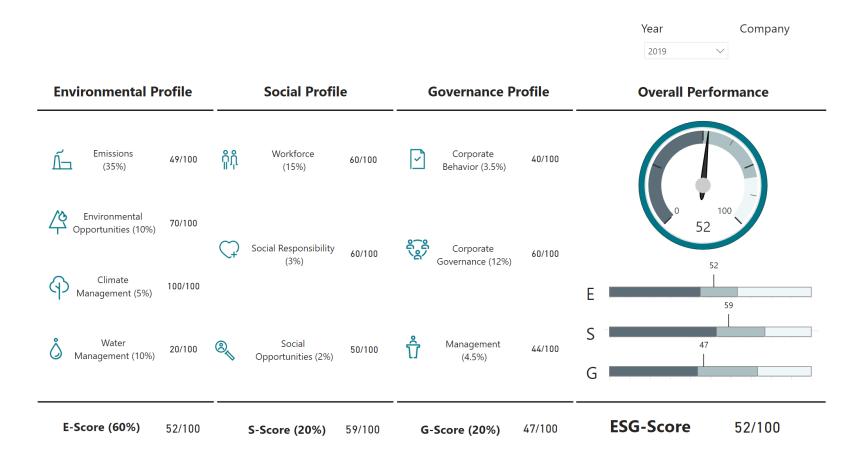
- Aligns SASB metrics with Energy Insurer considerations
- Condensed to 33 key metrics automatically populated by Aon
- Easily accessible through an online portal
- Data to be validated by clients prior to sharing with markets





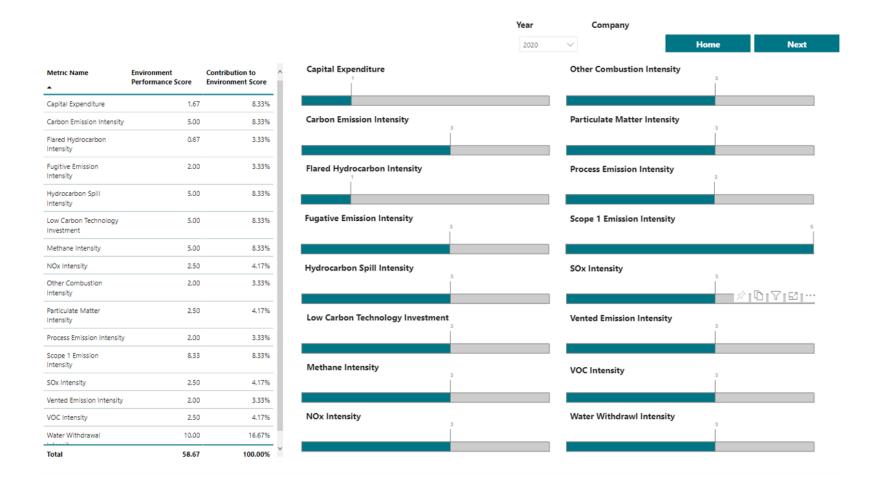


### **ESG Performance Index**





### **Environmental Profile**





### **Leading and Lagging**



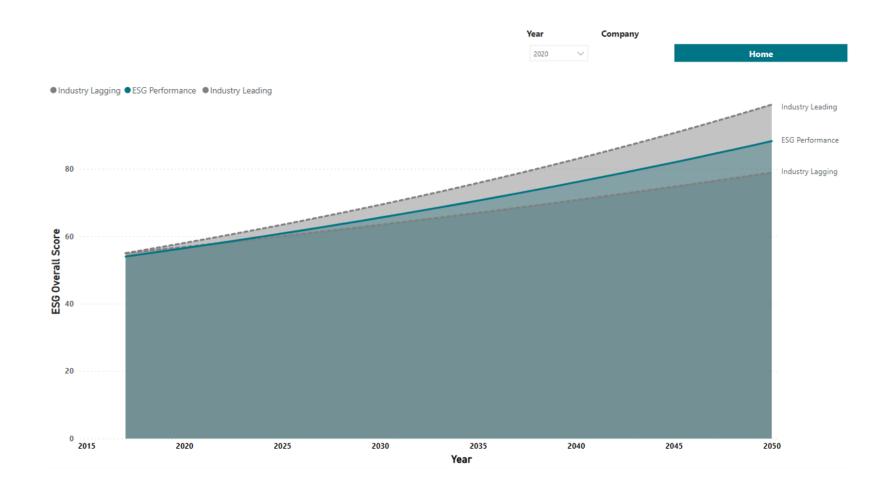


Year





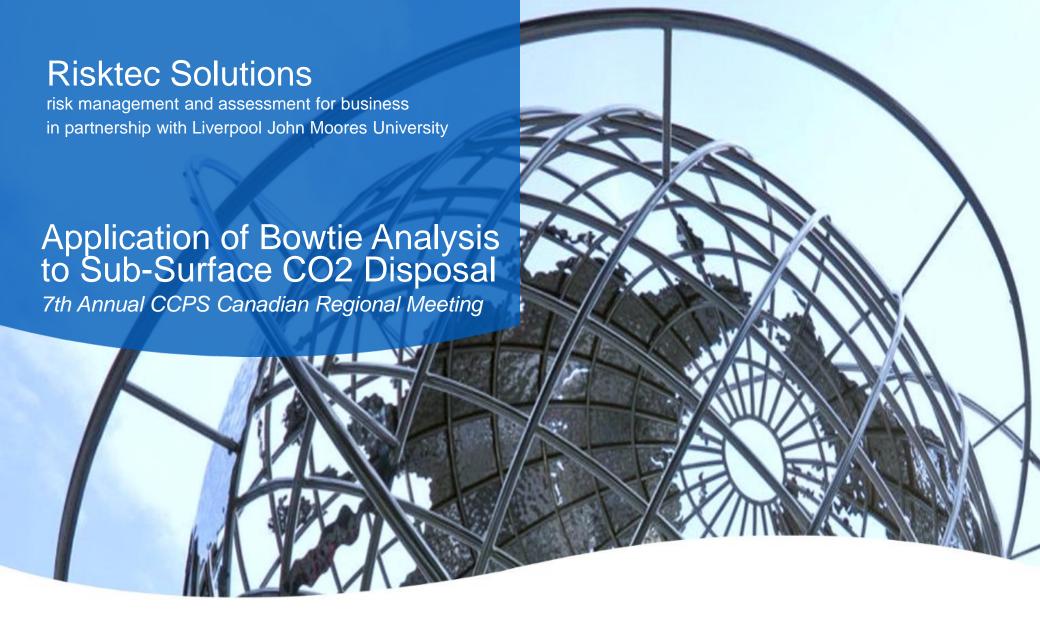
## **ESG Forecasting**





# Thank You



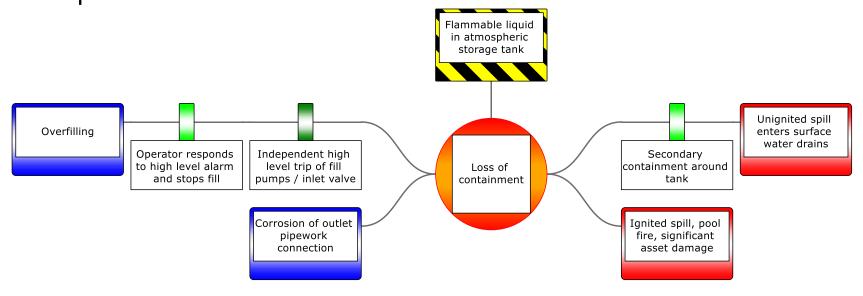




### Introduction to Bow Tie Analysis

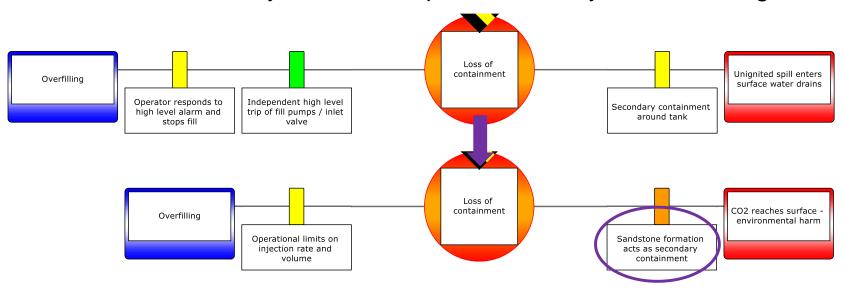
- Application of bowtie analysis within the oil and gas industry globally is mature
- Used to graphically represent how Major Accident Hazards are being managed

• How can we take this well-established approach and adapt it for sub-surface CO2 disposal?



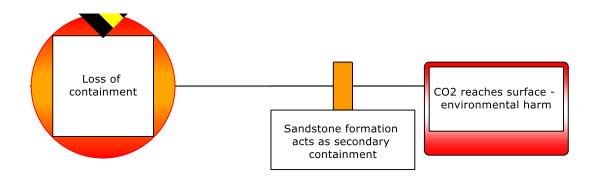


- Prevention and mitigation measures include natural geological formations or features which act as impermeable barriers or provide secondary containment
- Absence of conventional process industry-type reliability data for geological barriers means the analysis must adopt different ways of evaluating the barriers





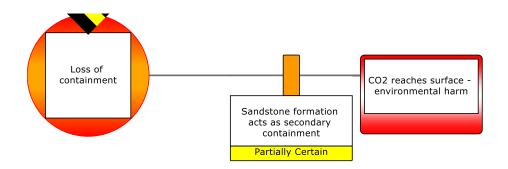
#### **Barrier Effectiveness**



Fully effective	Geological controls with extremely low permeability and physical facts which cannot be overcome.	
Effective	Geological controls with low permeability.	
Partially effective	Geological controls which act as 'buffers' or 'baffles'.	
Ineffective	Geological layers which are highly permeable.	



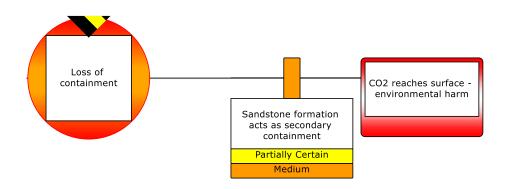
### **Barrier Certainty**



Fully effective	Reasonably certain	Barrier effectiveness rating is based on expert judgement and project-specific evidence, data or analysis
Effective  Partially effective	Partially certain	Barrier effectiveness rating is based on expert judgement and may rely on relevant evidence, data or analysis from other projects / locations
Ineffective	Uncertain	Barrier effectiveness rating is based on expert judgement but there is currently no relevant evidence, data or analysis



### **Barrier Criticality**

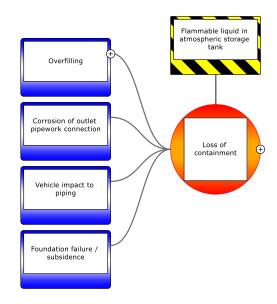


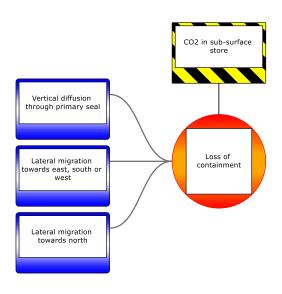
Fully effective	Reasonably certain	Very High Criticality	Crucial to the viability of the project. No or very few other effective barriers that can prevent the unwanted event, which has a very high likelihood or extensive consequences. Or barrier occurs on multiple bowtie branches.
Effective	Partially certain	High	If the barrier fails the likelihood of the unwanted event increases but there are alternative barrier(s) that can prevent the event. There are few other effective barriers on the bowtie branch.
Partially effective Ineffective	Uncertain	Medium	Subject to a moderate amount of focus and attention in terms of analysis, ongoing monitoring and maintenance. There are alternative barrier(s) that can prevent the unwanted event.
		Low	Subject to a limited amount of focus and attention in terms of analysis, ongoing monitoring and maintenance. There are several alternative barrier(s) that can prevent the unwanted event.



### Challenge 2: Defining Threats / Causes (Mechanism vs. Pathway)

- In traditional MAH applications, each causal branch considers a specific mechanism by which loss of containment can occur.
- Approach often requires amendment to ensure fit-for-purpose CO2 disposal diagrams (causal branches depicted for release pathways).

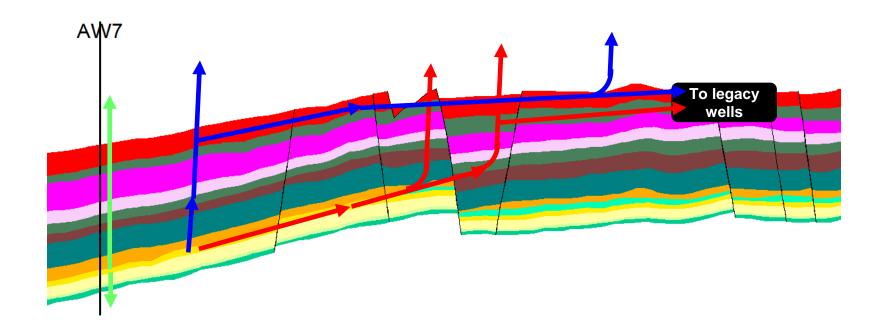






### Challenge 2: Defining Threats / Causes (Mechanism vs. Pathway)

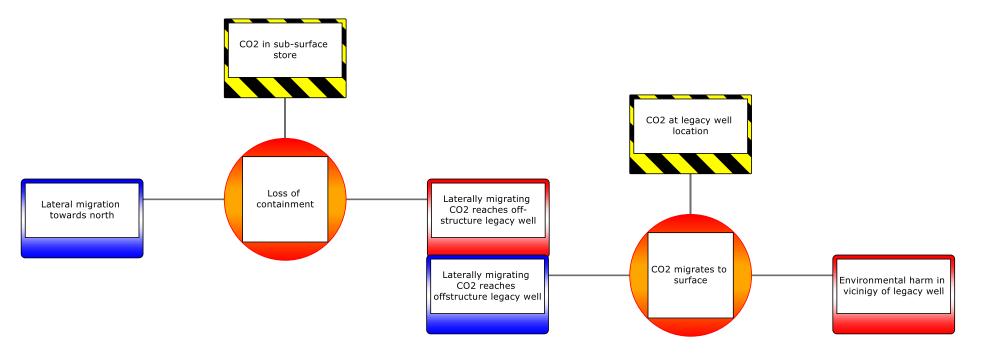
 Diagram highlights different leak paths taken by the CO2 injected into the reservoir





### Challenge 2: Defining Threats / Causes (Mechanism vs. Pathway)

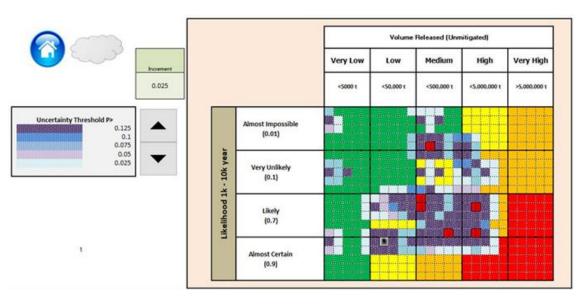
 Pathway approach allows for a network of interconnected bowtie diagrams which collectively form an overall bowtie model for the storage complex to be generated





### Challenge 3: Is the risk tolerable?

 Absence of traditional numerical risk values and acceptability criteria results in challenges associated with proving that the risk of unwanted CO2 release from storage is adequately managed.



Cai	ndidate Risk Reduction measure	Recommendation
1	Fibre optic monitoring in injection well annulus	Recommended
2	Additional seismic monitoring	Consider further
3	Deep set monitoring for presence of CO <sub>2</sub> within cement	Not recommended
4	Injection of tracers in CO <sub>2</sub>	Consider further

		Sacrifice / Cost		
		Н	М	L
<u>.</u>	Н			1
Benefit	М		2	
<u> </u>	L	3		4



#### Conclusions

- Bowties provide an easily understood representation of how risks are managed

   'standard' approach can be adapted for CO2 subsurface storage although
   there are challenges
- 2. Applicable at all stages of project updated as more information becomes available and uncertainty improves
- 3. Dependent on the quality of facilitation and personnel involved all disciplines need to provide input



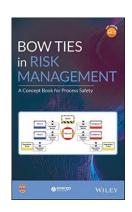
#### **Further Information**

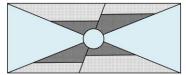
 Bow Ties in Risk Management: A Concept Book for Process Safety

https://www.aiche.org/ccps/resources/publications/books/bow-ties-risk-management-concept-book-process-safety



 Subsurface Evaluation of CCS and Unconventional Risks SECURe | Subsurface Evaluation of CCS and Unconventional Risks | (<a href="https://www.securegeoenergy.eu">https://www.securegeoenergy.eu</a>)











# Thank you for your attention

#### **James Sneddon**

Clean Energy Team Lead - Americas James.sneddon@risktec.tuv.com risktec.tuv.com











# CCPS Update Calgary Regional Meeting September 8, 2022

Michele Horwitz CCPS Membership Manger michh@aiche.org 646-495-1371





# About CCPS

- Not for profit organization supported by Corporate Members globally
- It is part of the American Institute of Chemical Engineers [AIChE]
- It was started on 23 March 1985, in response to the Bhopal Union Carbide tragedy, which lead to a collaborative effort to eliminate catastrophic process safety incidents.
- Our headquarters are in New York City, offices in Mumbai, Frankfurt and Houston (representing Latin America Region)

# Vision



# A World without Process Safety Incidents

# Mission

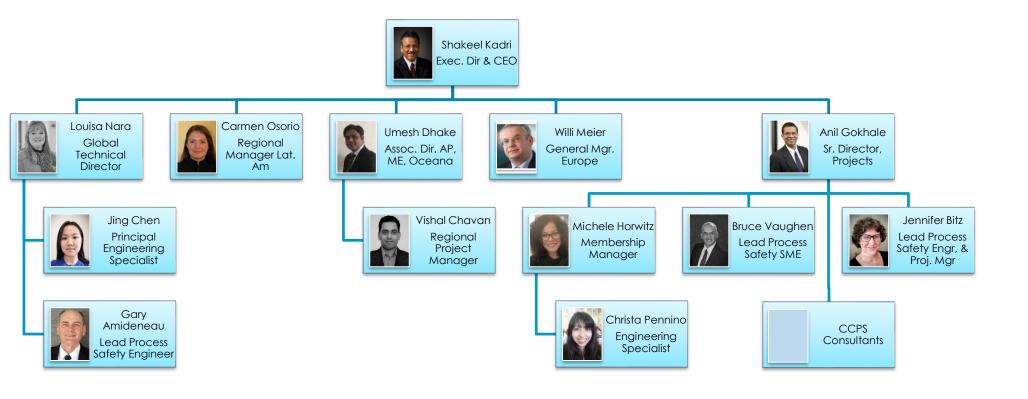


### CCPS is committed to achieve a world without Process Safety incidents by:

- Serving as a premier worldwide resource for <u>Process Safety knowledge</u> and understanding
- Advancing Process Safety <u>culture</u>, <u>technical</u> concepts and <u>management practices</u>
- Enhancing individual & organizational Process Safety competency
- Fostering <u>collaboration</u> within and across organizations, at all levels
- Promoting Process Safety as a key <u>societal value</u> and foundation for <u>responsible</u>, <u>sustainable operation</u>



# **CCPS Staff**





### CCPS CANADIAN MEMBERS



















# 40 Organizations in Attendance (15 Mbr Comp)



- ABS Engineering
- ACM Facility Safety
- AON Energy Risk Engineering (M)
- ARC Resources Limited
- Avantor (M)
- BakerRisk (M)
- Cailin Energy Corp.
- Canadian Natural Resources Ltd. (M)
- Cenovus (M)
- ClearSky Risk Management, Inc.
- CNOOC International
- ConocoPhillips
- DNV (M)
- Dow Chemical Canada ULC (M)
- Factory Mutual Insurance Co.

- GOARC (M)
- INEOS Canada Partnership Ltd.
- Inter Pipeline (M)
- IQ Trucking Consultants Inc.
- Jensen Hughes (M)
- KDS Process Safety
- Kent PLC
- Keyera
- LIVE Electrical & Controls Ltd.
- LUPATECH Canada
- MAADEN WAAD ALSHAM PHOSPHATE Co.
- Mann Enterprise
- Marsh
- Memorial Univ. of Newfoundland

- NOVA Chemical Corp. (M)
- Orano
- Paramount Resources
- Parkland Refining (BC) Ltd. (M)
- PETRONAS CANADA (M)
- Rio Tinto (M)
- Risktec Solutions, Inc.
- Strathcona
- Suncor Energy
- TC Energy (M)
- University of Alberta



#### 25 New Members

# 2022 New Members data as of September 2022

#### **United States**

#### 8 US Members





#### 25 New Members

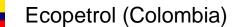
# 2022 New Members data as of September 2022

### Non-US (17 Members)









Engineers India Limited (India)

Fatima Fertilizer Company Ltd. (Pakistan)

Finolex Industries, Ltd. (India)

Gerdau Aços Longos S.A. (Brazil)

#### Non-US



Heritage Petroleum Co. Ltd (Trinidad & Tobago)

HPCL –Mittal Energy Ltd. (India)

PrefChem PENGERANG REFINING Co. (Malaysia)

PROAIM (China)

Shaanxi Beiyuan Chemical Industry Group Co.,

Ltd (China)

Showa Yokkaichi Seikiyu Co., Ltd (Japan)

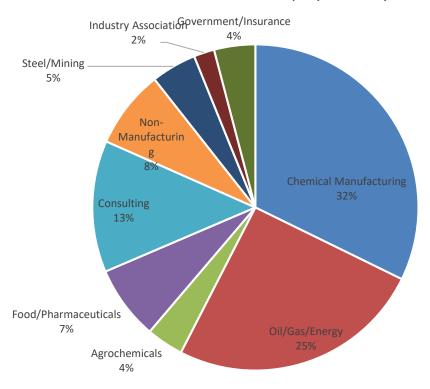
Transpetro (Brazil)

Uniphos Colombia Plant Ltd. (Colombia)

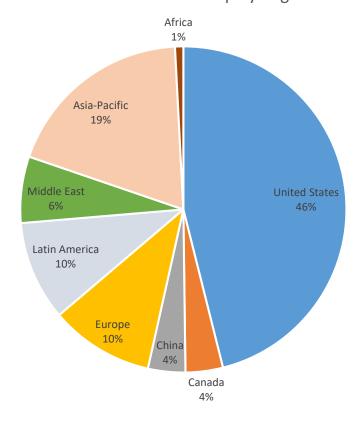


# CCPS Membership by Industry and Region [2022]

#### 2022 CCPS Membership by Industry



#### 2022 CCPS Membership by Region



# 244 Member Companies (September 2022)





### **Global News**



+25 members in 2022, 244 total members to-date, 46%US-54% Int'l Mbers

- 95% of the budgeted 2022 membership dues received
- Handles all North American Recruitment & worldwide retention
- Executes details for Canadian and US TSC Meetings



- 2023 Project Planning effort underway
- Global TSC Web Conference 9/22/2022
- 19<sup>th</sup> GCPS Call for abstracts is now open



**Projects** 

- 3 Books and several Monographs published (2022)
- Various Credentialing Offerings for Students, Young Professionals and Experts
- 25+ Ongoing projects, programs and initiatives
- **PSIE Software Refresh in Progress**



# Global / Regional Engagement









Annual Global TSC Meeting in Houston
November 2-3, 2022

CCPS Canada Regional Calgary September 8, 2022

CCPS China Regional
Virtual

CCPS South East Asia Member Meeting, Pattaya, Thailand November 29, 2022

CCPS India Regional
Virtual

CCPS Africa Regional Virtual – Oct 4, 2022



# Active Responsible Collaborations

Organization	Collaborating activity
Energy Institute [EI]	Bow Tie Guideline Book + Human Performance
Society of Petroleum Engineers [SPE]	Process Safety for Upstream concept book completed
European Process Safety Center [EPSC]	7 <sup>th</sup> Edition Global Conference of PS + Big Data Conference planned
EPSC	RAST / CHEF Virtual & in-person workshops are very popular
Shenyang Research Inst. of Chem. Ind. Co., Ltd. (SYRICI)	Guidelines for fine chemicals process safety in China
Singapore Chemical Industry Council [SCIC]	Global Summit [2025]
American Chemistry Council [ACC]	Formal Engagement at Membership level + Leadership Workshop
Instituto Brasileiro DePetroleo – IBP	Joint execution of 2020 CCPS Latin America Conference
Instituto Brasilerio Mineracao (IBRAM)	Collaborating at Latin America Process Safety Conference [2022]
Jordanian Engineers Association [JEA]	MOU signed, JEA also became a CCPS member
Egyptian Ministry of Petroleum	MOU being processed, major collaborative plan in the works
Chemical Safety Board [CSB]	Collaborative support on mutually important process safety programs



# **CCPS Membership Benefits**







Technical Steering Committee Meetings (5 annually)

- One dinner and in-person meeting following Global Congress on Process Safety
- —3 meetings via web conference February, June, September annually
- TSC Meeting in Houston area each November



Global Regional meetings – outside USA (1-3 annually per region)



Project committee meetings (as needed)

-Typical project meets monthly by web conference for 1-3 hrs.

Value of TSC meetings: Member sharing and interaction leads to an open exchange of ideas and lessons learned



















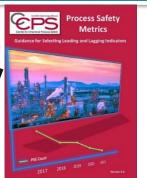






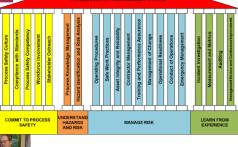
Conducting Global Conferences and Training

















## Pharma, Food and Fine Chemicals Subcommittee



#### 2022 workshops

- Dust hazards
- Chemical Reactivity

### **Open System Chemical Operations**

 Presented on March 1st by Frank Renshaw PhD, CIH, CSP, CCPSC, and CCPS Instructor & Consultant.

Hierarchy of requirements e.g. standards, regulations, internal procedures

Presented on May 10th by Peter Lodal - PE, CCPSC

NFPA Combustible Dust - Consensus Standards & Development of NFPA 660

Presented on July 20th by Chris Aiken, Cargill, Senior Director Process Safety

#### **Additional Workshops**

November 1 Face to Face – Houston

## Interested in Forming a



## Minerals, Mining & Metals Subcommittee?

- If so, what key topics of interest would you most be interested in exploring?
- Would you be interested in joining and <u>actively</u> <u>contributing?</u>
- If so, please reach out to Michele Horwitz (me) at
   Michh@aiche.org with your replies to the above



# Education and Training

- Classroom and eLearning Content
  - LOPA
  - HAZOP Studies and other PHA Techniques for Process Safety and Risk Management
- In Person Training & Continuing Education
  - Risk Based Process Safety
  - Incident Investigation
  - Human Factors for Safety & Improved Performance
- Boot Camps Taught by 30+ Year Veterans
  - Presented virtual or at company site, related to company goals and objectives
- Free eLearning Courses for New Member Companies
- Free Sponsored Webinars for member companies >75
- Free CCPS course opportunities for newly launched CCPS courses
- Member Discounts on Conference or Education Training



# Executive Leadership

Process Safety Leadership – Workshop Overview

#### **Who Should Attend**

Designed for top-level executives, this workshop will address the needs of:

- Corporate executive leadership teams
- Business leadership teams
- Regional leadership teams

#### **Key Learnings**

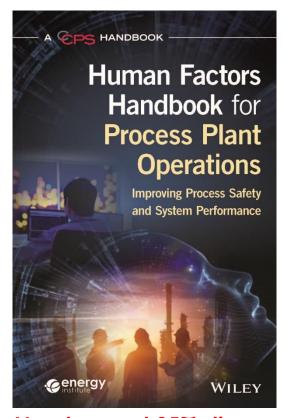
In this interactive session, you'll learn how to:

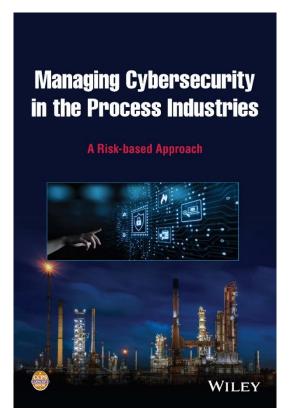
- Establish a process safety vision and roadmap
- Make a business case for process safety
- Understand why process safety isn't just safety
- Hone your process safety communication and visibility skills
- Define process safety accountabilities and responsibilities at the senior level
- Align personal commitment, courage and conviction to process safety
- · Drive your culture with your leadership
- · Establish the corporate safety imperative

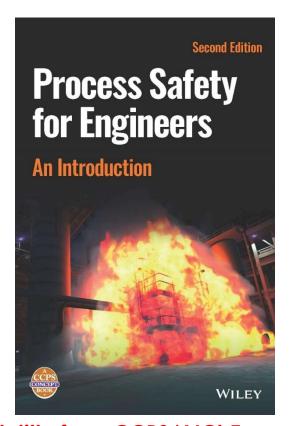


## New Books 2021 - Free to member companies









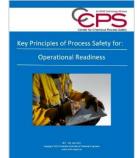
Members get 35% discount on previously published book title from CCPS/AIChE



# Ongoing Projects

- Book of Beacons
- G/L for Process Safety in Pilot Plants & Laboratories
- G/L for PHA Revalidation & Update 2<sup>nd</sup> Ed.
- G/L for Managing Abnormal Situations
- G/L for Process Knowledge Management
- G/L for Chemical Reactivity Evaluation
- Golden Rules of Process Safety (MOC Published)
   Development
- Safe Work Practices, Energy Isolation coming soon Development





Details: https://www.aiche.org/ccps/projects

### Ongoing

Completion Q4

Publication Q4

Publication Q4

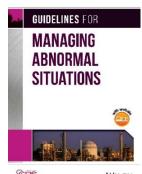
Publication Q1 - 2023

Publication Q3 - 2023

Ongoing New Topic

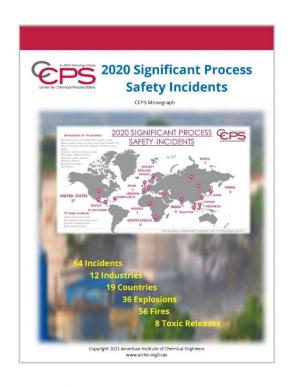
Ongoing New Topic

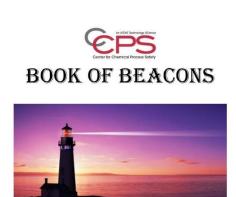




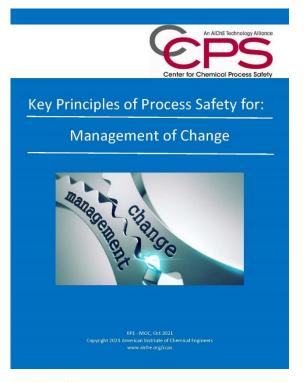
# Online Publications (more on web)











2020 Incident Monograph

Key Principles / Golden Rules

Book of Beacons 4th Release







#### **Containment Dikes and Pads**

Beacon

Messages for Manufacturing Personnel

June 201



Most people recognize that containment dikes around storage tanks, and sloped containment pads for pumps, process buildings and structures, truck and rail car unloading areas, and other potential spill locations have an important environmental protection function — preventing contamination of soil and surface water. But, do know that they often also have important safety functions? Some examples include: - limiting the spread of a fire and preventing exposure of other equipment if a flammable material spills and is ginted

 preventing contact of incompatible reactive materials in case of leak or spill
 limiting the spread of spilled corrosive material and preventing contact with equipme which could be damaged by contact with the corrosive material

In 2001, the US Chemical Safety and Hazard Investigation Board (CSB) investigated a fire that destroyed a petroleum blending facility in Texas. Poor dike design and maintenance resulted in burning liquid spreading the fire from tank to tank, eventually engulfing the whole plant.



**CPS** 

←Spill containment dikes for chemical storage tanks

A sloped containment pad directs any spills from a truck unloading facility to a chemical sewer trench



#### What can you do?

- Periodically include containment dikes around storage tanks, sloped containment areas, and drainage trenches as part of your routine plant safety inspections. Look for physical damage, spilled material, accumulation of rain water in dikes, or blocked drainage. Look for debris, equipment, or anything which restricts flow of a spill.
- Make sure that your plant procedures include pumping out or draining rain water from containment dikes – if a dike is partly filled with rain water, it may not be able to contain a large spill.
- If you have any kind of valves or other piping to remove rain water from a containment dike, make sure these are closed or otherwise blocked when not being used.

  The way the property of the pipe sure that the pipe su
- If you do any maintenance or construction work on a storage dike which results in damage to the integrity of the dike, make sure the damage is repaired before the job is finished.



The arrow shows a hole in a containment dike. More damage can be seen at the base and the top of the dike wall. Other examples of damage include cracks in dike walls or floors, holes where pipes have been installed passing through dike walls, and anything else which would allow spilled material to flow out of the dike area.

#### Inspect and maintain your containment dikes and pads!

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The Beacon is usually available in Afrikaans, Arabic, Chinese, Danish, Dutch, English, French, German, Greek, Gujarati, Hebrew, Hindi, Hungarian, Indonesian, Itali
Japanese, Korean, Malay, Marathi, Norwegian, Persian, Polish, Portuguese, Russian, Spanish, Swedish, Tamil, Thai, Telugu, Turkish, Urdu, and Vietnamese.

- More than a million readers
- 31 languages
- Delivered monthly
- Just celebrated 20<sup>th</sup> anniversary of publishing
- Used as a safety training tool

# Compare & Contrast



CCPSf	CCPSC
Certificate granted following completion of courses. Content for the courses included in cost.	Certification granted following application approval and passing an exam that tests knowledge, skills, and competency.
No degree or experience required. Students and Early Career Professionals encouraged.	Requires STEM degree and at least 5 years professional experience (or 10 years with no degree) and three professional references.
Completion of 24 SAChE courses (different than a degree-granting program). Good preparation for CCPSC. PS Basics, Intro to Hazards, Understanding Risk, Practical Applications for Managing Risk, RBPS Pillars	Competency as measured against a defensible set of standards (CCPS RBPS Elements), by application and exam.
Usually listed on a resume detailing education.	Credentials to be listed after one's name: CCPSC
Demonstrates understanding of course content at the end of each course.	Has on-going requirements in order to maintain; including PDH and renewal fees.
More information and cost: <a href="https://www.aiche.org/ccpsf">https://www.aiche.org/ccpsf</a>	More information and cost: <a href="https://www.aiche.org/ccpsc">https://www.aiche.org/ccpsc</a>



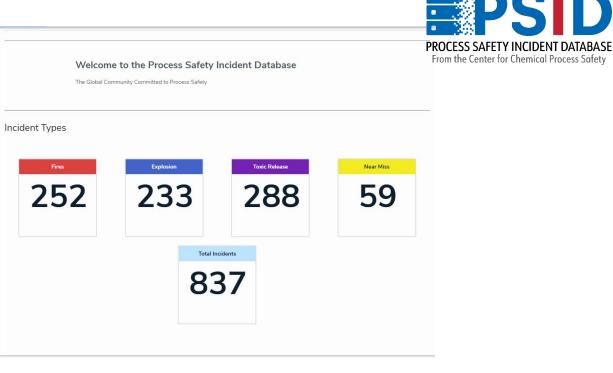
An AIChE Technology Alliance

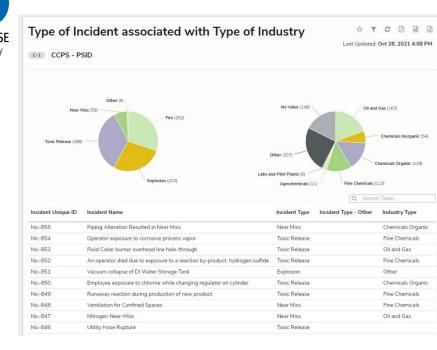
Center for Chemical Process Safe





## Signup at <a href="mailto:ccps\_psid@aiche.org">ccps\_psid@aiche.org</a>



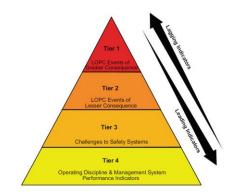


## Process Safety Metrics



- API 754 3<sup>rd</sup> Edition released Aug 2021
- CCPS issued a revised metrics document that is harmonized with the API-754 3<sup>rd</sup> edition
- CCPS had representation on the API-754 revision committee
- CCPS is updating PSIE software tool

https://www.aiche.org/ccps/process-safety-metrics





4th Edition

# CHEF Virtual Workshop



- 10 Recorded sessions
- Duration: 2-hours/session
- Delivered by Ken First &
- Dr. Bruce Vaughen

## CHEF Workshops

## Workshop Content

#### What are the Hazards?

- Flammability Hazards
- Toxicity Hazards
- Reactivity Hazards
- Other Hazards

#### What can go Wrong?

- Inherently Safety Design
- Hazard Evaluation Techniques
- Hazard and Operability Study (HAZOP)
- Development of Incident Scenarios

#### How Bad could it be?

- Source Models
- Vapor Dispersions
- Explosions
- Impact Assessment

#### How Often might it Happen?

- Frequency Evaluation
- Overview of Risk Analysis

#### Is the Risk Tolerable?

- Scenarios, Enabling Conditions and Conditional Modifiers
- Procedures and Human Error
- Preventive Safeguards/Protection Layers
- Mitigating Safeguards/Protection Layers

#### **Application and Case Studies**

# RAST Workshop



## Hands on workshop with several exercises & case studies

## **Getting Started**

- Opening the tool
- Example Case study
- Data Input
- Reports

#### **Chemical Data**

- Data used
- Adding new Chemicals
- Create a chemical mixture

#### **Reactivity Data & Evaluation**

- Reactivity Screening
- Data Input
- Reactivity Evaluation
- **Process Upsets**

#### **Additional Input & Reports**

List of Reports & Inputs

#### **Scenario Development**

- Loss of Containment events
- Scenario Creation in RAST
- Initiating events

**Workshop Content** 

- Incident types & Outcomes
- Screening criteria
- Screening Library
- User defined scenarios

#### Risk Analysis & LOPA

- Consequence Modeling
- Likelihood / Frequency
- Risk Matrix
- Scenario selection for analysis
- LOPA

#### Case Studies

Class exercise(s)





# LOPA Tool

CCPS Database	Utilization in 2020	Importance of the CCPS Tool
LOPA Tool	Provide access to LOPA to your company employees.	<ul> <li>This is a benefit for employees of CCPS member companies. Full access requires login.</li> <li>Guidelines for Initiating Events and Independent Layers of Protection build on LOPA by:</li> <li>Providing additional examples of initiating events (IE) and independent protection layers (IPLs)</li> <li>Provides more guidance for determining the value of each prospective initiating event frequency (IEF and IPL probability of failure on demand (PFD)</li> <li>Proving more information on the overall management systems as well as other considerations specific to a particular IE or IPL, which are needed to support the use of the values. <a href="https://www.aiche.org/ccps/resources/tools/lopa">https://www.aiche.org/ccps/resources/tools/lopa</a></li> </ul>



## More CCPS Member Benefits...

- Involvement and participation on Technical Projects, Books, Tools, Monographs
- Voting on new projects to enhance process safety initiatives worldwide

• Free postings in the Professional Services Directory for all CCPS Service Comp's.

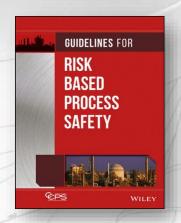






# FOUNDATIONS OF RISK BASED PROCESS SAFETY

"The Basics for the PROCESS SAFETY EXCELLENCE JOURNEY"



Calgary AB
October 24-27, 2022
4 day interactive workshop







## Format and Logistics

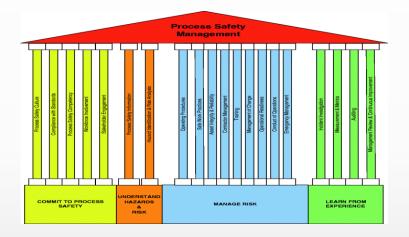
- Presentations and interactive discussion
- Techniques and methodologies
- Accident case studies
- Videos
- Team breakout exercises
- Quizzes





## Workshop Scope

- Process Safety
  - ➤ Background and purpose
  - Process safety vs Occupational Safety
- Accident Theory
- Loss of containment/leaks and spills
- Process hazards/fire/explosion/toxicity
- Engineering safeguards
- Risk Management/ risk acceptance/RA techniques
- RBPS elements detailed analysis and discussion





## Who should attend?

- Personnel with direct process safety responsibilities
- Chemical / mechanical engineers
  - ➤ Operational
  - > Technical support
  - ➤ Design/project responsibilities
- Plant managers
- Senior process operators / foremen / supervisors
- Other safety personnel (including training)

Suggest 2 attendees from each organization



7<sup>th</sup> Annual CCPS Canadian Regional Meeting

Regulatory scan for market entry of small-scale modular energy generation using hydrogen fuel cells







Sama Manzoor, Doctoral Student

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Anusha Priya, Masters Student

Department of Chemical and Materials Engineering, Faculty of Engineering, University of Alberta

apriya1@ualberta.ca



### **Presentation Overview**

Introduction

**United States Federal Regulations** 

California State Regulations

**Canadian Regulations** 

**Next Steps** 



### Introduction

General
overview of
which
regulations
apply to
Hydrogen in
various North
American
jurisdictions



Hydrogen specifically listed



Discussing flammable/hazardous gases generally, which should cover hydrogen



Another material (i.e., natural gas) that would need to be modified to include hydrogen



## **US Federal Regulations**

**Code Development Organizations** 

**Standard Development Organizations** 

#### **Regulatory Bodies**

















## California State Regulations



California Department of Forestry and Fire Protection (CAL FIRE)



The Office of the State Fire Marshal (OSFM)



California Fire Code

California Residential Code



## **Canadian Federal Regulations**







Natural Resources Canada







## **Canadian Provincial Regulations**

Ontario Alberta British Columbia











## **Next Steps**

- Review the regulatory gaps and overlaps within a specific geographical area, considering the various Authorities Having Jurisdiction
- Consider whether the regulatory framework from one jurisdiction (like California) might be adopted in other jurisdictions (like Texas or Alberta) and how this would govern design and siting decisions
- Narrow down the regulatory review to more specific design and operational questions which apply to our Hydrogen product
- Other market entry considerations (economic incentives, infrastructure requirements, etc.)
- CSA Approval processes

#### 7<sup>th</sup> Annual CCPS Canadian Regional Meeting

# Addressing the problem of marginally explosible dusts

## Albert Addo

Ph.D. Candidate
Process Engineering & Applied Science,
Dalhousie University, Halifax, NS,
Canada



## Presentation outline

- Introduction
- Problem statement
- Research objectives
- Experimental work
- Results and discussions
- Conclusions

## Introduction – dust explosions

- A dust explosion can occur when finely divided solid material is suspended in air and in the presence of a sufficiently energetic ignition source
- Five factors come together cause a dust explosion



Dust explosion pentagon

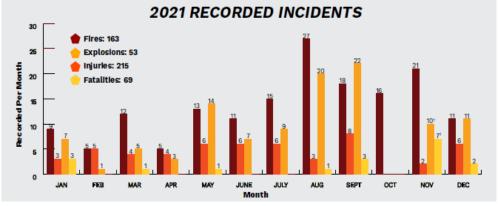
 Dust explosions may cause fatalities, injuries, business interruptions, property and environmental damages



Effect of a dust explosion in a foundry (February 1999, Massachusetts).



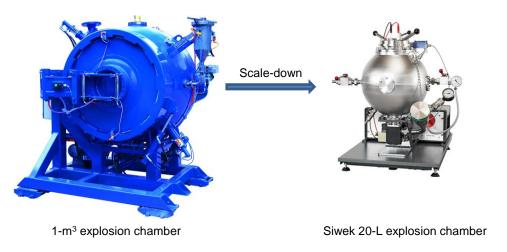
Fine plastic dust explosion and fire that ripped through a pharmaceutical plant (North Carolina, 2003).



2021 recorded incidents (Cloney, 2022)

### Introduction – marginally explosible dusts

- Dust hazard identification is a vital step in the dust explosion risk assessment process
  - explosible or non-explosible
- Two of the explosion test apparatus used are the 20-L and 1-m<sup>3</sup> chambers



- 1-m<sup>3</sup> chamber is the preferred choice of vessel
- over time, industry has accepted the 20-L sphere as the test standard

- Due to:
  - cost (testing expensive pharmaceutical dusts), handles 50 times less material
  - ability to give data that correlates with 1-m<sup>3</sup> data
  - testing hazardous and toxic materials
- However, some recent studies have shown that
  - data does not always corelate in both vessels especially for <u>low-K<sub>St</sub> dusts</u>
- Some studies have referred to these dusts as "marginally explosible dusts (MEDs)
  - characterized by deflagration index (K<sub>St</sub>) values
     45 bar·m/s in the 20-L chamber with 10-kJ ignition energy

### Problem statement

- Recent interest in overdriving has resulted in "hard rules" in industry that suggest that:
  - if K<sub>St</sub> < 45 bar·m/s in the 20-L chamber, non-explosible at larger scale (Proust et al., 2007; ASTM E1226. 2018)
  - if  $K_{St} > 45$  bar·m/s, and  $P_{max} > 5$  bar, then not overdriven
- Lack of understanding with reference to scaling low-K<sub>St</sub> values from the 20-L explosion chamber for design of safety strategies
- Different opinions whether to refer to these dusts as "low-reactivity" or "marginally explosible"
  - difficulties in the design of dust explosion safety measures as a result of the ambiguity

### Research objectives

- The study focuses on low-K<sub>St</sub> dusts in the 20-L chamber. These are suspicious and raise the questions;
  - whether these low-K<sub>St</sub> dusts actually pose an explosion risk on the industrial scale?
    - ✓ Severity of explosion
    - ✓ Likelihood of explosion
  - what physics and chemistry account for the peculiar behavior exhibited in these two chambers (20-L and 1-m<sup>3</sup>)?
  - whether the claim that MEDs have low ignition sensitivity is accurate?
  - what level of protection is required for facilities that handle these dusts (i.e. "basis of safety")?
    - √ has a direct influence on cost
- Answers to these questions will provide guidance to industry on how to handle these dusts
- To answer these questions, two strategies have been deployed namely,
  - experimental approach (which is the focus of the current presentation)
  - probabilistic modeling approach using Bayesian Networks (work in progress)

#### Experimental approach

- Materials selected due to the low-K<sub>St</sub> values as reported in NFPA 652
  - carbon black
  - oat grain flour
  - urea
  - zinc
- Material characterization
  - particle size distribution
  - moisture content
  - bulk density
  - proximate analyses
  - ultimate analyses
  - polydispersity
  - TGA/DTG
  - FTIR

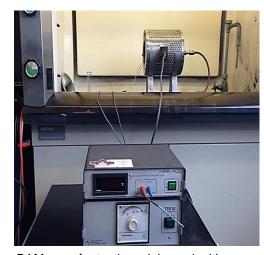
- Explosion severity parameters tested using 20-L (with 10-, 5-, 2.5-, 1-, and 0.5-kJ ignition energies) and 1-m<sup>3</sup> chambers (with 10-kJ ignition energy)
  - maximum explosion pressure (P<sub>max</sub>)
  - deflagration index (K<sub>St</sub>)

#### Explosion likelihood parameters

 minimum explosible concentration (MEC) using 20-L and 1-m<sup>3</sup> chambers



MIKE-3 apparatus for testing minimum ignition energy (MIE)

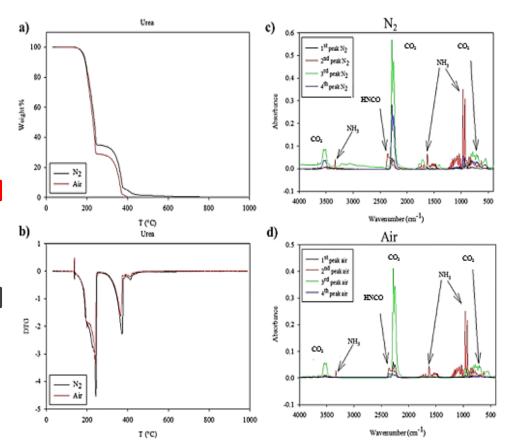


BAM oven for testing minimum ignition temperature (MIT) 102

#### Some results to demonstrate the behaviour of marginal explosibility

Explosion Severity (P<sub>max</sub> and K<sub>St</sub>) of urea and zinc dusts

		20 L		1 m³	
Material	Ignition	60 ms		600 ms	
	Energy (kJ)	P <sub>max</sub>	K <sub>St</sub>	P <sub>max</sub>	K <sub>St</sub>
		bar(g)	)	bar(g)	(bar⋅m/s)
Urea	10.0	3.0	7	0	0
	5.0	0.0	0.0	_	_
	2.5	0.0	0.0	_	_
	1.0	0.0	0.0	_	-
	0.5	0.0	0.0	_	_
Zinc	10.0	6.2	57	6.0	129
	5.0	6.7	45	_	_
	2.5	6.4	43	_	_
	1.0	6.2	41	_	_
	0.5	5.5	40	_	_



(a) Weight % and (b) DTG curves as a function of temperature (°C) in nitrogen (black line) and air (red line) flow of urea. FTIR on gaseous species in (c) nitrogen and (d) air flow

#### Thermochemistry of carbon black and zinc

#### Typical combustion reaction for:

• carbon black: 
$$C(s) + \frac{1}{2}O_2(g) \longrightarrow CO$$
  
 $C(s) + O_2(g) \longrightarrow CO_2$ 

- surface burning, fuel and oxidant react in different physical phases (i.e., solid/gas) (Heterogeneous combustion)
- Zinc:  $Zn(s) + \frac{1}{2}O_2(g)$  ZnO(s);
  - no hydrocarbon bonds in Zn to break, surface burning (Heterogeneous combustion)
- Differently from zinc, the interaction between carbon black particles and oxygen is faster and active at low temperature.

#### Conclusions

The disagreements related to marginally explosible dusts can be addressed by:

- choosing the right test chamber for measuring the explosibility of marginally explosible dusts
- identifying the dominant combustion modes (homogeneous or heterogeneous) of materials
- performing a detailed thermal analyses which provide very important information about the explosibility of a dust, in addition to the usual physical and chemical characteristics (e.g., PSD, proximate and ultimate analysis)

# THANK YOU

#### Questions?

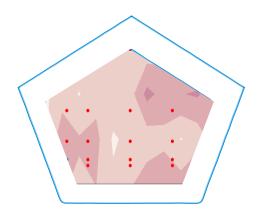
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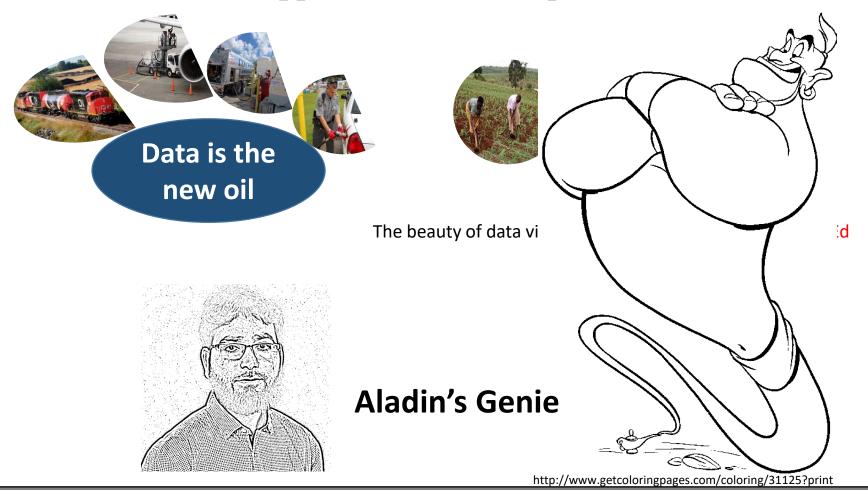
### **Data-Driven Approach to Dust Explosion Risk Reduction**



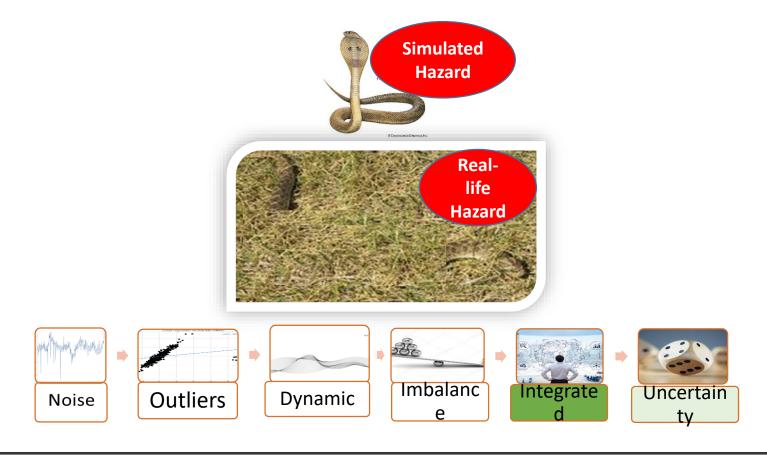
#### **Mohammad Alauddin**

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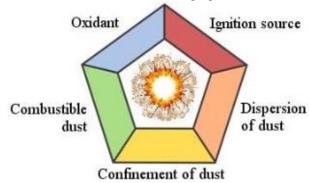
## Data-Driven Approach to Dust Explosion Risk Reduction



#### Data-related challenges of modeling of process safety systems



## Data-Driven Approach to Dust Explosion Risk Reduction



https://www.sciendo.com/article/10.1515/rput-2015-0006

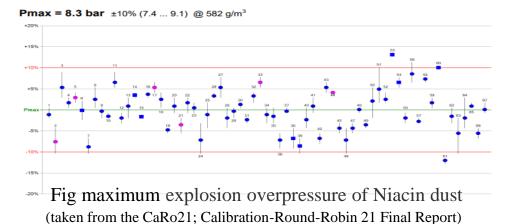
#### **Explosion Severity**

- P<sub>max</sub>
- K<sub>St</sub>

#### **Explosion likelihood parameters**

- · minimum ignition energy (MIE)
- minimum explosible concentration (MEC)
- minimum ignition temperature (MIT)

#### 2. Explosion Indices Pmax, Kmax



Particle size

Moisture

Dispersibility and mixing patterns

Change in the chemical composition of the samples

Equipment malfunctioning and human errors

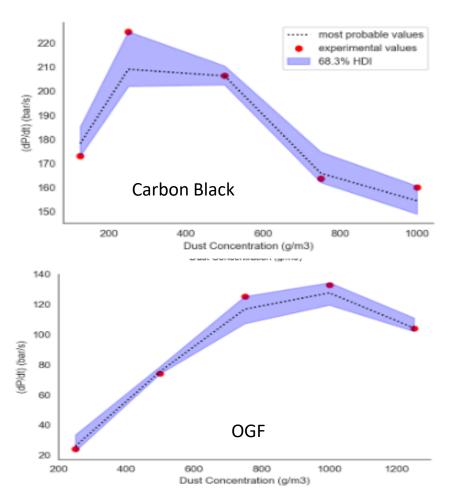
## Data-Driven Approach to Dust Explosion Risk Reduction

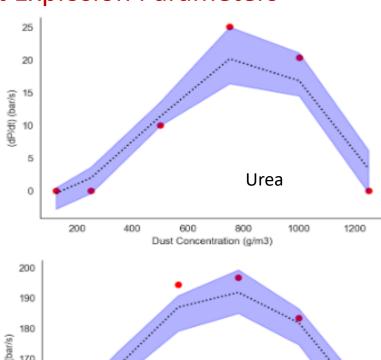
Part A: Probabilistic Modeling of Dust Explosion Parameters

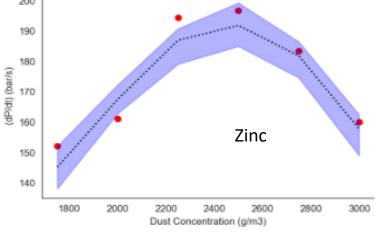
Part B: Determination of explosibility and nonexplosibility conditions

Part C: Handling source variabilities using Hierarchical Modeling

#### Part A: Probabilistic Modeling of Dust Explosion Parameters







#### Part B: Determination of explosibility and nonexplosibility conditions

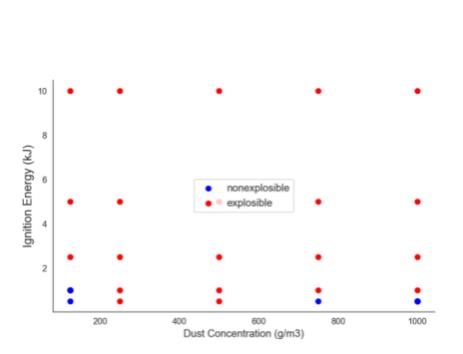
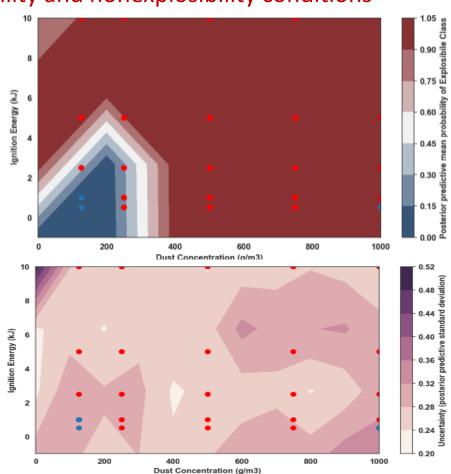
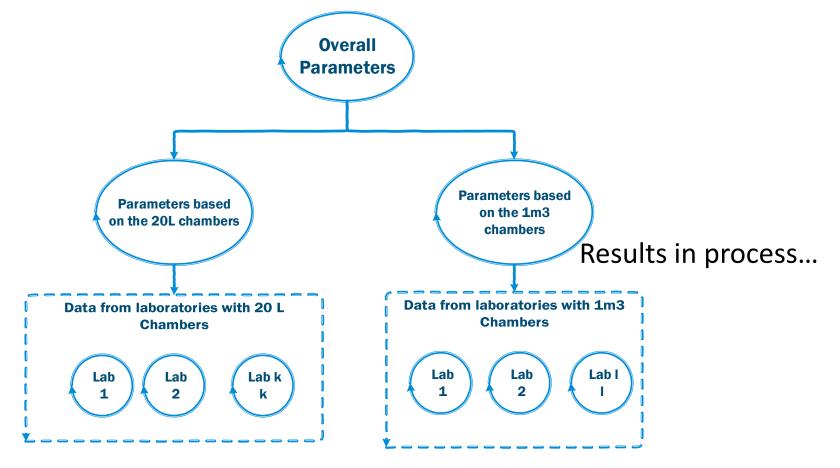


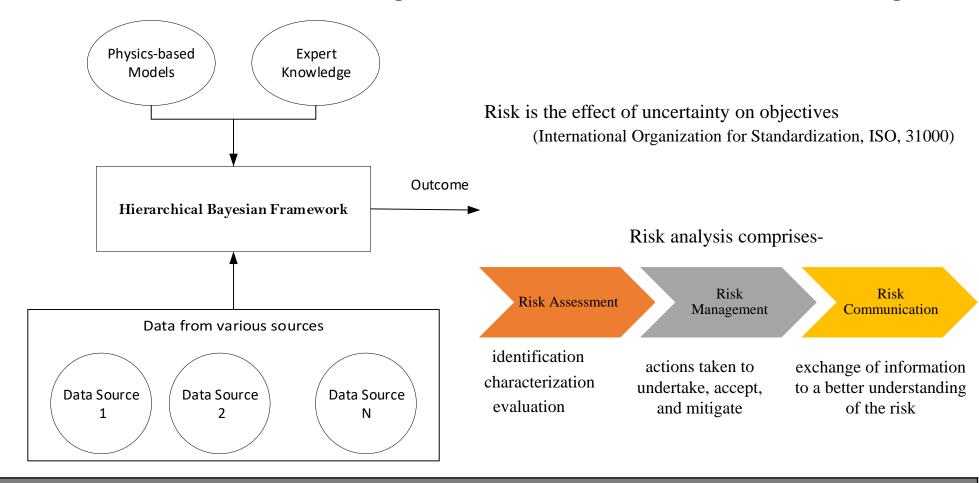
Fig : Effect of Ignition energy and dust concentration on the explosibility of dust



#### C: Handling variabilities using Bayesian Hierarchical Modeling



#### Information fusion using semi-mechanistic Hierarchical Modeling



#### **Conclusion**

- Overview of data-related problems in data-driven modelling
- Probabilistic modeling of dust explosion parameters
- Probabilistic determination of explosibility conditions
- Information fusion for handling uncertainties of distinct sources

#### Acknowledgement

#### Advisor

Dr. Paul Amyotte

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- Natural Sciences and Engineering Research Council
- WorkSafeBC

# Thank You!

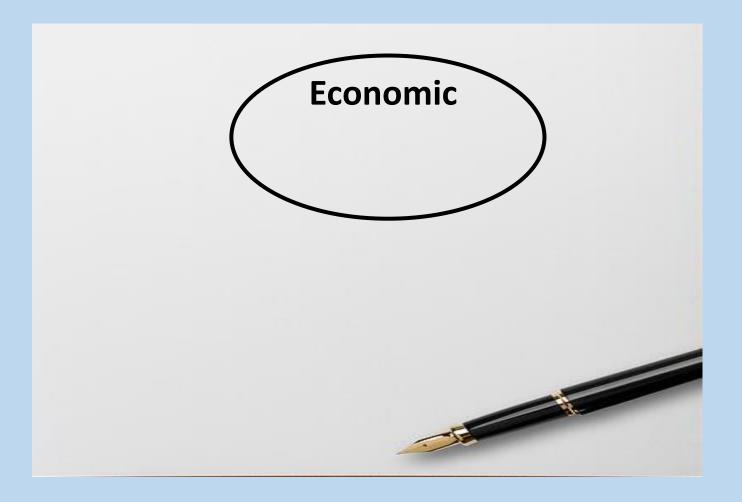
For feedback comments, and suggestions please contact at: mdalauddin@dal.ca









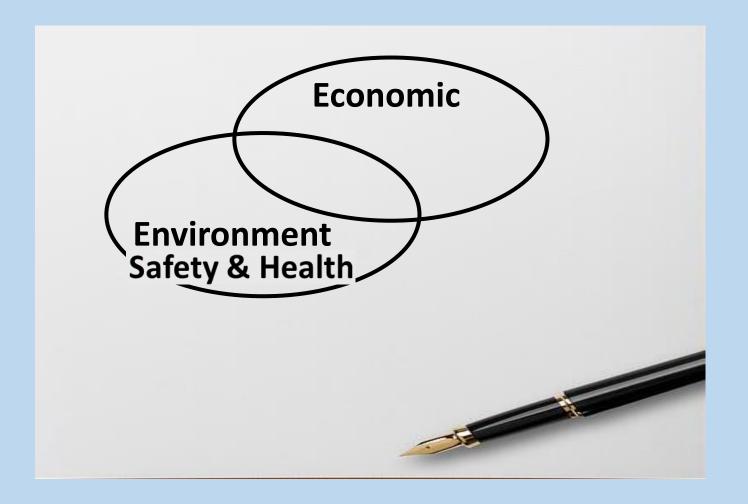












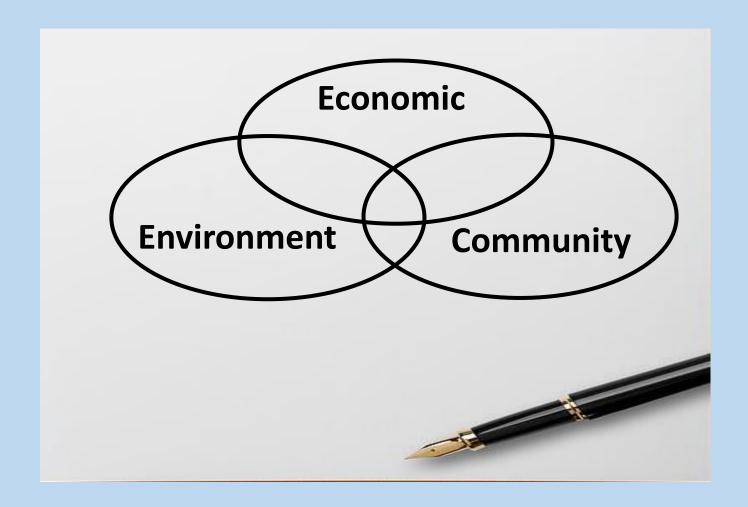












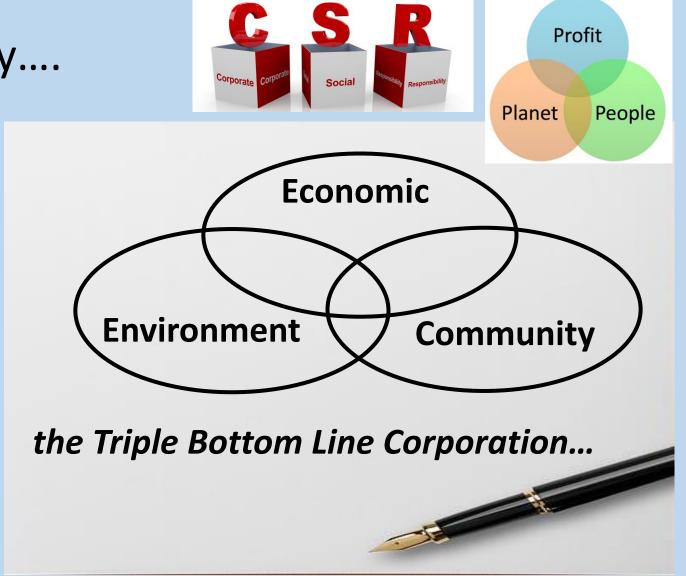






















Safety & Health

Community

Triple Bottom Line Corporation...













# The Sustainability Journey....













- Greater **Transparency**
- **Greater Efforts**
- **Greater Good**

# **ESG (WEF)**

- People
- **Planet**
- **Prosperity**

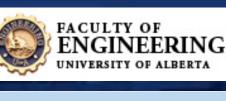
Planet

**Principles of Governance** 





**ENVIRONMENTAL** 



**Profit** 

People



THE CANADIAN
ENERGY SECTOR IS A
LEADER IN ESG
GLOBALLY.

It's no surprise to us to read the conclusion from a study prepared by Worley Parsons Canada "that Canada's Environmental Assessment processes are among the best in the world."

Many of our corporations are being viewed as "best in the world" for their ESG performance.







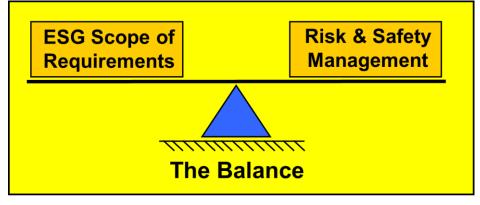


Accountability Informing RISK

Excerpt from Canada's Energy Leadership Opportunity – Marc Van Wielingen



# The Sustainability Journey....Keeping Our Focus



#### **Importance to Business**



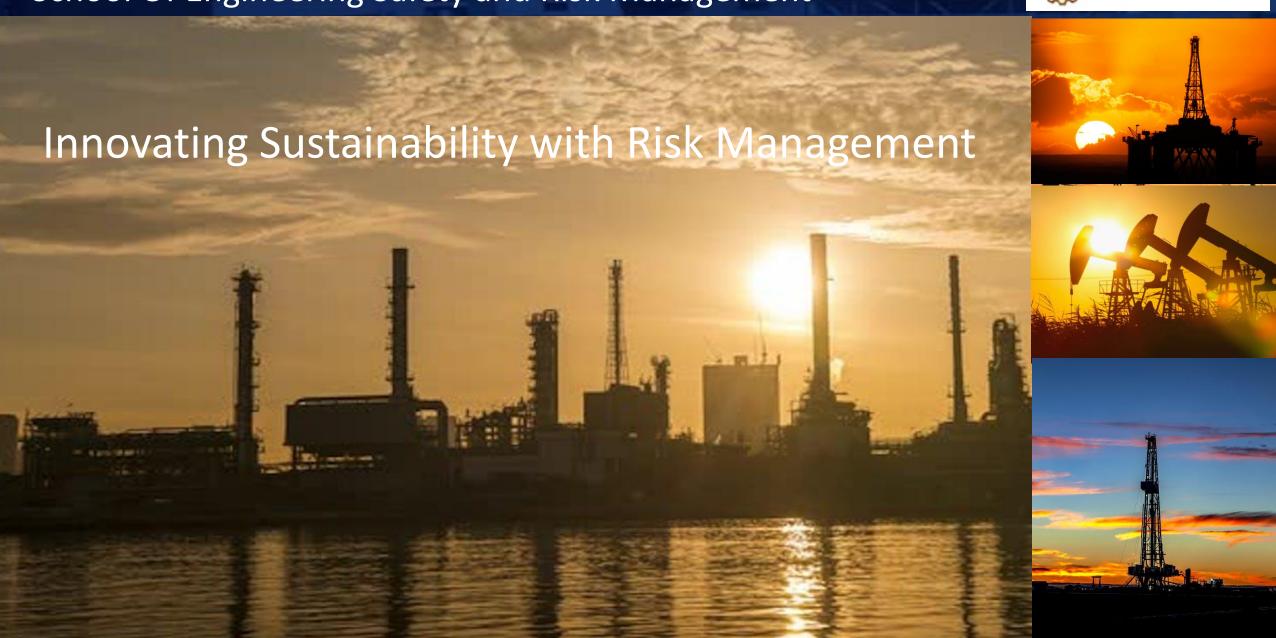
















Risk Management is the Fourth Pillar of Sustainability