

October 11, 2016

Shari Young
Secretary of the Board
National Energy Board
517 Tenth Avenue SW
Calgary, AB
T2R 0A8

Dear Ms. Young:

RE: Notice of Intent to Order Pipeline Companies to Publish Emergency Management Program Information

The City of Vancouver welcomes the opportunity to comment on the Notice of Intent to Order Pipeline Companies to Publish Emergency Management Program Information. The City of Vancouver's position has not changed on the requirements for transparent, accountable EM programs for NEB regulated pipelines and facilities. The City believes that comprehensive risk assessment is the foundation of an effective EM program for pipeline companies; comprehensive risk assessments must be inclusive of the consequences to local communities from the range of incidents that could affect a pipeline or facility.

The City of Vancouver has already contributed to this consultation by attending the local government consultation in May of 2015, and submitting written comments in June of 2015. As noted by the National Energy Board, many of the comments put forward during that round were not able to be addressed through the Order to publish Emergency Procedures Manuals. Given the contributions and recommendations that the City has already provided to the NEB, we would like to reiterate those points as they relate to the Draft Order (below), and again, refer the Board to the June 2015 submission (attached) for inclusion in this new Order.

Thank you for your consideration of our submission and please don't hesitate to reach out as required.

Yours truly,

Daniel Stevens
Director, Emergency Management

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With respect to the Notice of Intent to Order Companies to Publish Emergency Management Programs, and specifically the information contained in Appendix A, the City of Vancouver provides the following comments.

Emergency Procedures Manual (See page 6 of attached June 2015 Submission)

The City of Vancouver acknowledges the NEB Order for companies to publish Emergency Procedures Manuals as of September 30, 2016. Upon initial review of some of these manuals, the City of Vancouver believes that there remains an opportunity for improvement in the content of these manuals, such that it better assesses consequences to, protects, and prepares local communities. The information contained within these manuals should reflect the specific consequences of the range of potential hazards and product types given the environment. The publication of these manuals is an opportunity not only to understand the quality of content, but also to assess the content requirement. The City of Vancouver would like to reiterate the following for consideration by the NEB as it establishes requirements for improved emergency management programs, and effective emergency procedures manuals:

The current system limits the capacity of local authorities to assess the risk to the public, the environment and first responders. In order to mitigate the consequences of an incident, including an oil spill, fire or explosion, on the public, emergency procedure manuals must be developed in consultation with local first responders. These manuals must include, at a minimum:

- Clear and agreed upon notification protocols for local authorities and first responders.
- Protocols for access to real-time information about the product, including MSDS and all precautionary measures required in the event of a spill.
- The location and plans to deploy air and water monitoring equipment and plans appropriate for the range of products that may be transported.
- Personal Protective Equipment appropriate to respond to all scenarios.
- Pre-determined evacuation areas and routes developed through worst-case scenario based planning.
- Identification and Geographic Response Plans for local resources at risk and sensitive sites.
- Location of corresponding equipment required to implement GRPs, and priorities for deployment.
- Pre-determined priorities for shoreline protection and established end-points for clean-up and remediation.
- Pre-determined plans to initiate environmental monitoring and assessment procedures, including sampling of the spilled product, water, soil, sediment and air quality.
- Control point and geographic response plans based on industry best practices for all environments that may be impacted by an oil spill or emergency. Response time should be calculated and tested for all personnel and equipment to control point locations.
- Recovery and remediation plans for multiple scenarios and conduct assessments of the consequences of proposed clean-up and response methods for communities.

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Hazard Identification, Risk Assessment and Controls (please see also page 5 of attached June 2015 Submission):

- Hazard identification and risk assessment should be separate from the controls section. Risk should be assessed independent of any assumptions about controls.
- Include the full range of socio-economic and environmental impacts of spills of different products, and of the impacts of proposed clean-up tactics, with a specific focus on sensitive and high-value sites.
- Pre-identify Incident Command Posts, and demonstrate the capacity to fill all positions within a fully expanded Incident Command Structure with specified timeframes and to employ the best available technology in the management of the incident.
- Include in emergency response plans response to the range of hazards that could impact their operations. For example, where earthquake risk exists, companies must assess the impacts of the earthquake on their staff and contractors, and develop contingencies to be able to respond to pipeline ruptures in that context.
- Provide the terms of mutual aid and third party contractor agreements and make accessible the full details of equipment, capacity and transportation.
- Maintain real-time and accessible databases of response equipment and personnel.
- Identify conditions that would preclude response to an incident, including but not limited to weather and marine conditions, traffic and transportation impediments, and risks to first responders.

Stakeholder Liaison to Prepare for Emergencies (please see page 4 and 5 of attached June 2015 Submission):

- Develop and test, with local authorities, plans to manage all predictable elements of a response within a region, including but not limited to:
 - notification of local authorities and the public;
 - dissemination of public information throughout the response and recovery;
 - emergent volunteers;
 - wildlife response and rehabilitation;
 - waste disposal;
 - access to land and waterways for response;
 - short and long term monitoring of public health;
 - testing of air and water quality;
 - environmental monitoring protocols;
 - shoreline assessment and clean-up (marine and freshwater); and
 - protection of sensitive sites and ecological, social, cultural and economic values.
- Test plans, equipment, and demonstrate capacity to respond to oil spills for the full range of products shipped, including sunken and submerged oils.
- Maintain response equipment that is effective in all operating conditions, and be able to demonstrate the ability to deploy equipment in all operating conditions as per specific GRPs and Control Point Plans.

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Training and Exercises (please see page 4 of attached June 2015 Submission):

- Develop and test business continuity plans to ensure capacity to respond under adverse conditions; third party response contractors must do the same.
- Publicly release after-action reports and improvement plans from all drills, exercises, near-misses, and incidents.
- Develop exercise scenarios that address unique consequences to and test integration and coordination of response with local communities.
- Training and exercising should be done for the purpose of identifying gaps for the purpose of improving all-hazards plans, not solely for certification purposes under limited scenarios.