

## **NEB MODERNIZATION DISCUSSION PAPER #7 EMERGENCY PREVENTION, PREPAREDNESS AND RESPONSE: TOOLS AND REQUIREMENTS**

### **Question #1 - In your opinion, are the existing emergency preparedness and response tools and requirements sufficient? If not, what additional tools or requirements are needed?**

Metro Vancouver has participated in the review process of Geographic Response Plans (GRP) for the proposed Trans Mountain Expansion Project. Energy companies generally have processes in place to anticipate risks but these processes do not always accurately identify all of the risks, or the at-risk areas. An engagement process with all local authorities and First Nations that surround the proposed or existing infrastructure is vital to identifying areas of concern and preparing realistic and effective mitigation and response plans. An example of this is that Kinder Morgan was unaware of some environmentally sensitive areas in an area protected by Metro Vancouver but not officially listed as a Park or Preserve; meeting with the proponent allowed an identification of this area and enabled a special GRP to be developed for this location to mitigate any effect of the pipeline passing in close proximity.

While NEB-regulated companies are required to publish Emergency Procedures Manuals (EPMs) on their public websites, regulated companies should be required to file copies of their EPMs with the local authorities, or at least provide a link to their plans directly to the local authority. Filing of EPMs with the NEB does not ensure that this information is proactively made available to those that are first and directly affected by an incident.

On the [NEB Emergency Response](#) webpage the following statement is made... "Where multiple jurisdictions may be involved at an incident site, the incident command system can be expanded to a unified command structure. It is also the NEB's policy to become a member of unified command, where the NEB, the company, provincial agencies and possibly local government or indigenous jointly oversee and direct the response to an emergency."

This should be modified to "require" that local government and/or Indigenous are included rather than "possibly" included.

**Question #3 - In addition to information the NEB currently makes public about compliance and enforcement, is there additional information that should be made available over the lifecycle of a regulated project? If so, what?**

While it appears that the information is available, there is some difficulty with searching for and retrieving it.

For example, the [database](#) descriptions of two separate compliance verification activity, one found in compliance and the other not in compliance, essentially read the same way. The description does not say whether a non-compliance was noted, or describe what the non-compliance was.

**Found In compliance:**

Compliance Verification Activity (CVA)	Aurora Pipe Line Company Ltd.	Aurora Carway Loop Pipeline	Field Inspection – Damage Prevention, 1617-020	2016-05-19 <a href="#">CVA Report</a>
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**Found Non-compliant:**

Compliance Verification Activity (CVA)	Westcoast Energy Inc., carrying on business as Spectra Energy Transmission	Fort Nelson Gas Plant (BC)	Field Inspection – Environmental Protection, 1617-338	2016-04-03 <a href="#">CVA Report</a>
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Prior to 2015-09-28 the descriptions were more detailed and described briefly the non-compliance. Since then the descriptions are basically all the same and do not differentiate whether compliant or not. The previous practice of describing the event should be re-instated.