



**Chemistry Industry Association of Canada**      **Association canadienne de l'industrie de la chimie**

# **RESPONSIBLE CARE<sup>®</sup>**

## **VERIFICATION REPORT**

### **IMPERIAL OIL LTD.**

## **PRODUCTS AND CHEMICALS DIVISION - PETROCHEMICALS**

*MAY 14<sup>TH</sup>, 15<sup>TH</sup> and 16<sup>th</sup> 2013*

#### **Disclaimer**

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC) to provide advice to the above company and assist it in meeting its Responsible Care commitments as a member of the Association. The material in it reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member company which is the subject of this report to interpret and act on the findings and recommendations in this guidance document as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the association, its member companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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## EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of Imperial Oil-Chemicals. (IOC) The verification was undertaken on May 14<sup>th</sup>, 15<sup>th</sup> and 16<sup>th</sup> 2013 and included team visits to the Sarnia petrochemical facility. The verification team also conducted interviews with other company personnel and external stakeholders at locations the team was unable to visit. This was the sixth Responsible Care verification completed for Imperial Oil- Chemicals. The last verification was completed on February 22<sup>nd</sup> and 23<sup>rd</sup> 2011.

While considering all aspects of the Responsible Care Commitments during this verification the team placed an emphasis on conducting an in-depth examination of company aspects related to:

- Process Safety Management (PSM)
- Contractor Safety Leadership
- The loss prevention management system
- Environmental Management (environmental business planning)
- Energy conservation

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the Finding Requiring Action identified during the verification - summarized below and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.



**Verification Team Leader    June 3, 2013**

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

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## SUMMARY OF VERIFICATION TEAM OBSERVATIONS

### Findings Requiring Action

1. It is a finding requiring action that there is not a management system in place to address the Responsible Care® Commitments requirement to “promote Responsible Care® by name”. (P10)

### Works in Progress

1. In relation to the application of Stewardship Code numbers ST85,87,102&109 there is a work in progress to add these code requirements to the new product development management system. (P11)

2. A review process is being implemented to upgrade the inspection and integrity analysis of the site benzene line. (P10)

### Improvement Opportunities

1. There is an improvement opportunity to develop a social responsibility statement as described in Appendix “A” of the Responsible Care® Commitments booklet. (P16)

2. There is an improvement opportunity to have an ongoing process in place at the Sarnia site to ensure that all neighbours that could be seriously affected by a site emergency know what action to take should one of these scenarios occur in the event of a site emergency- Ref OP#39. (P10)

3. There is an improvement opportunity for an assessment of the effectiveness of the Community Dialogue Management System. As a benchmark the involvement of the Blue Water Community Advisory Panel in the planning process for gathering and sharing information, especially regarding site risks and emergency response expectations, would be an asset to the assessment process.- Ref: Accountability code section 2. (P12)

4. There is an improvement opportunity to include “sustainability” and “Responsible Care®” as subject matter on the Imperial Oil- Chemicals website. ((P12)

5. There is an improvement opportunity to review and revise, if required, the company vehicle selection process to determine if all pertinent sustainable selection criteria are in place. (P11)

6. There is an improvement opportunity to assess the learning value of “predicted security probes” of perimeter fencing. (P10)

### Successful Practices

1. PSM was identified as a focus area for the verification. After review the PSM was judged by the team as a successful practice. Two innovative components of PSM that stand out are: “Transient HAZOP” and the “Incident Risk Assessment Tool” (IRAT). The former expands the scope of the HAZOP process to preplanned but intermittent operations and the latter is a corporate-wide intranet based information collection system that assigns a numerical value to process incidents as a method of prioritization for corporate-wide sharing and stewardship.

2. The Loss Prevention Management System, also a focus area, was also judged by the team as a successful practice. Innovative components of the management system are: High Learning Value incidents shared across the corporation, the Safety Acts Index which is an improved variation on work place safety observations and the “Zero In” safety training video library.

3. The support provided by the company for the Sarnia-Lambton Industrial Education Cooperative is viewed as a successful practice. The Cooperative provides standardized certified safety training to employees of area contractors. The Sarnia site 2012 total recordable injury rate, in relation to contractors, was “zero”

4. The team judges as a successful practice the Sarnia off-the-job safety program for employees. Since the last verification that management system has been expanded to include similar on-site training for employee family members.

5. The team judges as a successful practice the “layman’s MSDS” that provides an abbreviated version of MSDS hazard information to the end users of company products.

6. The team judges as a successful practice the Sarnia site management system that monitors and implements a reduction in fresh water use in site production processes.

7. The team judges as a successful practice the largely voluntary effort by the Sarnia site employees in the area of safety education for the community. This includes support of the province’s Young Worker Awareness Program by supplying teaching resources to a local high school.

# 1. INTRODUCTION

## 1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Imperial Oil- Chemicals operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

### *The Responsible Care® Ethic and Principles for Sustainability*

*We are committed to do the right thing, and be seen to do the right thing.*

*We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:*

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care, Imperial Oil- chemicals must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel) and
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website ([www.canadianchemistry.ca](http://www.canadianchemistry.ca)). Imperial Oil-Chemicals is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website [www.canadianchemistry.ca](http://www.canadianchemistry.ca), or by contacting CIAC Responsible Care Manager at [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) or (613) 237-6215 extension 233.

## **1.2 About Imperial Oil-Chemicals**

Imperial Oil-Chemicals, headquartered in Calgary, is a division of Imperial Oil Limited and is a major producer and seller of petrochemicals, ranging from primary petrochemicals to plastic resins and aliphatic and aromatic solvents.

Exxon Mobil Corporation is the major shareholder of Imperial Oil Ltd., having an equity position of 69.6 %, unchanged for more than a century. The balance of the ownership is widely dispersed and held by minority shareholders. Imperial Oil is self-financing and governance is provided by a Canadian board of directors, consisting of five non-employee directors and two employee directors.

As an affiliate of Exxon Mobil Corporation, IOC has access to Exxon Mobil Research and Development (R&D) for both processes and products. Imperial and Exxon Mobil also operate an employee interchange program to provide relevant technical and management development opportunities.

Imperial's chemicals business is managed within the Products (petroleum) & Chemicals Division, with a senior executive - the Manager of Imperial Oil Petrochemicals, reporting directly to Imperial Oil's Chairman, President and Chief Executive Officer. Imperial Oil, at a corporate level, develops and maintains up-to-date key policies for which all employees, associates, suppliers, and contractors are expected to follow.

The Manager of Petrochemicals has full accountability for all elements of the chemicals business. He is the CIAC signing executive and is fully responsible for the company's commitment to Responsible Care.

Most of IOC's principal functions (i.e. production, sales, and business development) are structured within an organization reporting to the Manager of Petrochemicals. IOC also

receives services from other functional organizational units within Imperial -- such as distribution, public affairs, materials procurement, legal, medical, and accounting. IOC has three main business entities: Basic Chemicals, Intermediates (solvents, fluids) and Polymers. The chemical production units are located at one large, multi-unit manufacturing site in Sarnia that produces approximately 1.1 million tonnes per year of chemical products. Feed stocks are obtained from externally purchased sources and from intermediate (petroleum) refinery streams at the site, principally light hydrocarbons (ethane, propane, butanes, propylenes, butylenes and naphthas).

Sarnia-produced chemical products are sold both domestically in all parts of Canada and internationally (primarily USA) using rail, truck and marine modes of transportation, with rail and truck the dominant modes

Additionally, the direct chemicals sales organization manages the sale of some Exxon Mobil chemical product lines to Canadian customers, such as the additives to soften plastics. It also manages the direct sales function of domestically produced chemicals to customers in the United States through its CIOL subsidiary (Canada Imperial Oil Limited).

The company owns and operates a bulk terminal and warehouse at its Sarnia site. Two carrier companies provide all the truck movements of chemical products under contract with a Responsible Care conformance requirement. Rail movement of chemicals is provided under contract by CIAC partner companies.

For more information on Imperial Oil-Chemicals and links to Imperial Oil please see: [http://www.imperialoil.com/Canada-English/products\\_chemical.aspx](http://www.imperialoil.com/Canada-English/products_chemical.aspx)

### 1.3 About This Verification

The verification of Imperial Oil-Chemicals was conducted on May 14<sup>th</sup>, 15<sup>th</sup> and 16<sup>th</sup> and included team visits to the Sarnia Petrochemical Facility. The verification team also conducted phone interviews with other company personnel and external stakeholders at locations the team was unable to visit. During the course of the verification, the team had the opportunity to interact with a wide range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This is the sixth verification exercise completed for Imperial Oil-Chemicals. The last verification was completed on February 22<sup>nd</sup> and 23<sup>rd</sup> 2011.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Cameron D. Dillabough	C.I.A.C.	Team Leader
Alec Robertson	C.I.A.C.	Industry verifier
Brenda Lorenz	C.I.A.C.	Public-At-Large Verifier
James Anger	Sarnia Community	Community Representative

## **2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)**

During the verification of Imperial Oil-Chemicals, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). While considering all aspects of the Responsible Care Commitments, the team placed an emphasis on conducting a more in-depth examination of certain company aspects identified by the company or the team related to:

- Process Safety Management
- Contractor Safety Leadership
- The loss prevention management system
- Environmental Management. (environmental business planning)
- Energy conservation

***In communicating its observations, the verification team will make repeated reference to the following categories of observations:***

- 1. Findings Requiring Action; document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.***
- 2. Works in Progress; document instances where the team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement opportunities.***
- 3. Successful Practices; document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.***
- 4. Improvement opportunities; identify instances where the team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.***

***The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:***

## **2.1 Team Observations Concerning Operations Code**

The Operational Integrity Management System (OIMS) is the overarching management system for Imperial Oil which encompasses Imperial Oil-Chemicals operations. This management system is comprised of eleven elements and sixty four related “expected outcomes” that directly correlate to the Responsible Care® Operations Code elements described in sub-sections 2.1.1, 2.1.2, 2.1.3 and 2.1.4. This statement is supported by the gap analysis conducted by the company in preparation for this verification. In 2010 the Lloyd’s Register Quality Assurance group certified that the OIMS met or exceeded the requirements of ISO 14000:2004 Environmental Management Standard and the OHSAS 18001:2007 Occupational Health and Safety Standard.

### **2.1.1 Design and Construction of Facilities and Equipment** (See comments above)

### **2.1.2 Operations Activities** (See comments above)

### **2.1.3 Safety and Security**

There are the appropriate management systems in place as components of the OIMS. A review process is in progress to upgrade the inspection and integrity analysis of the site benzene pipeline. The team has listed as an improvement opportunity a review and evaluation of predicted security probes at the fence lines. More value might be obtained from unannounced random security testing or probes. The requirements of OP39 are not explicit in the Community Dialogue Management System and the team has listed that as an improvement opportunity.

**The team has listed as an improvement opportunity the need to have an ongoing process in place at the Sarnia site to ensure that all neighbours that could be seriously affected by a site emergency know what action to take should one of these scenarios occur in the event of a site emergency- Ref OP#39. The requirements of OP39 are not explicit in the Community Dialogue Management System.**

**The team has listed as an improvement opportunity a reassessment of the learning value of “predicted security probes” of the Sarnia site perimeter fencing.**

### **2.1.4 Environmental Protection** (See comments above)

### **2.1.5 Resource Conservation**

Environmental Management is a component of the OIMS and is guided by published objectives such as:

- Drive operational incidents with environmental impact to zero.
- Deliver superior environmental performance
- Achieve industry leadership in key environmental areas.

To achieve these objectives the company utilizes a process called “Environmental Business Planning” which is described by the company as a management discipline that integrates environmental improvement objectives into business plans and strategies. Conservation of resources accomplishments include energy use reduction, continuous reduction of fresh water use at the Sarnia site and the use of recycled raw materials in polyethylene production. Environmental management was identified as a verification focus area and the team has listed two representative successful practices in this area. The reduction in energy use is part of a global initiative entitled the “ExxonMobil Global Energy Management System”.

**The team has listed as an improvement opportunity to review and revise, if required, the company vehicle selection process to determine if all pertinent sustainable selection criteria are in place.**

### **2.1.6 Promotion of Responsible Care by Name**

As previously noted OIMS is the overarching management system which is also the management system of the parent company ExxonMobil and as such while the Ethic and commitments to Responsible Care® are present within Imperial Oil-Chemicals.

There is not a structured management system in place to promoting Responsible Care® “by name”. In addition the team did not detect a seamless recognition on the “shop floor” between Responsible Care® and the OIMS.

**A finding requiring action concerning the requirement for a management system to promote Responsible Care® by name has been listed by the verification team.**

## **2.2 Team Observations Concerning Stewardship Code**

### **2.2.1 Expectations of Companies**

As previously stated in this report the Canadian entity that is Imperial Oil and the Chemicals division are wholly owned subsidiaries of ExxonMobil. All expectations of the technical aspects of bringing products to market be it research & development, compliance with regulations, dissemination of product health and hazard information, environmental concerns and technical interface with suppliers and customers are in place and administered under the OIMS. Divisional research and development efforts have allowed polyethylene production processes to operate with recycled raw materials. The company gap analysis did indicate that the management system addressing code elements ST85, 87,102, & 109 did not meet code expectations and a work in progress has begun to address this identified gap in the management system

### **2.2.2 Expectations with Respect to Other Parties**

A management system “Intermediates Canada Administration Procedures” has components that cover the Stewardship Code expectations for section 2.2.2. There were identified gaps pertaining to ST 123 & 124 that require specific information on sustainability to be shared along the value chain and promoting Responsible Care® with parties with which to company has indirect relationships.

## **2.3 Team Observations Concerning Accountability Code**

The guiding management system for applying the Accountability Code is OIMS element 10.1 which addresses community expectations and is supported by a corporate management system entitled “ExxonMobil Best Practices for External Affairs”.

### **2.3.1 Operating Site Communities**

Both management systems described above contain elements that support the requirements of the C.I.A.C. Accountability Code. Imperial Oil-Chemicals Sarnia location has a robust process of engaging the community through various avenues that include active membership on the Blue Water Community Advisory Panel, a community newsletter, participation of site employees in various community events and charities and publication by the parent company “Corporate Citizen Summary Report”. The Sarnia site has a comprehensive management system to receive and respond to questions or concerns that might be generated by near neighbours of the site or residents of the greater Sarnia area.

**The team has listed as an improvement opportunity an assessment of the effectiveness of the Community Dialogue Management System. As a benchmark the involvement of the Blue Water Community Advisory Panel in the planning process for gathering and sharing information, especially regarding site risks and emergency response expectations, would be an asset to the assessment process.- Ref: Accountability code section 2.**

### **2.3.2 Other Stakeholders**

The management systems described in section 2.3 with an additional management system entitled “The Issue Management Process” contain the elements that support the requirements of section 2.3.2.

**The team has listed as an improvement opportunity the recommendation to include “sustainability” and “Responsible Care®” as subject matter on the Imperial Oil-Chemicals Canadian website.**

### **3. TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM**

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments.

The verification team studied Imperial Oil-Chemicals management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide. The verification team's related observations to the company management system(s) are as follows:

The company OIMS is similar in design to the C.I.A.C. "Plan, Do, Check and Act" model required for robust Responsible Care® management. The management system components are: Scope & Objectives, Process & Procedures, Responsible & Accountable Resources, Verification & Measurement and Feedback & Improvement Mechanisms.

As previously described the corporate OIMS is comprised of eleven elements and various subsections to support the annual goals and objectives of both Imperial Oil and ExxonMobil. These management systems are applicable world wide and apply to all areas of the Global Corporation. The system supports not only the objectives of the company but of the various industry associations that are supported by both the Oil and chemical related portions of the business including the C.I.A.C. The OIMS is flexible enough to accommodate large comprehensive corporate goals and objectives and those of relatively small divisions or operational sites. The system is rigorously audited both internally and through external third parties. Some areas of focus chosen by the company for this verification are the result of the checking process that identified system performance improvement opportunities.

There is a Canadian OIMS Steering Committee that oversees the administration of the OIMS as it pertains to the petrochemical operations in Canada.

As supporting documentation on the following page there is a graphic depiction of the Imperial Oil-Chemicals OIMS which demonstrates the similarity to the C.I.A.C. Responsible Care® Plan, Do, Check and Act management System that is an expectation of all member companies.

# OIMS 11 Elements



## 4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY

Each CIAC member company is formally committed to the ethic of “*Doing the right thing, and being seen to do the right thing.*” This ethic, along with the principles for sustainability is expected to guide the company’s decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business.

The verification team carefully observed Imperial Oil-Chemicals decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible care Ethic and Principles For Sustainability as discussed in the Responsible Care Commitments (Appendix E). The verification team’s related observations on the company’s application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

***There are eight Principles for Sustainability:***

- ***Work for the improvement of people’s lives and the environment.***
- ***Be accountable & responsive to the public and local communities.***
- ***Take preventative action to protect health and the environment.***
- ***Innovate for safer products & processes that conserve resources and enhance value.***
- ***Engage business partners to ensure stewardship and security of products throughout their lifecycles.***
- ***Understand and meet expectations for social responsibility.***
- ***Work with stakeholders for public policy & standards that enhance sustainability, advance legal requirements & and meet or exceed their letter & spirit.***
- ***Promote awareness of Responsible Care® & and inspire others to commit to these principles.***

During the verification process the verification team was exposed to various management systems such as OIMS, Environmental Business Planning and the Standards of Ethical Business Conduct that all contain components of the Principles for Sustainability. Sustainability Principle eight could be challenging because of the name recognition of “Operational Integrity” throughout the company. The expectations of the remaining seven principles are fully met and in some cases exceeded in the areas such as support for the C.I.A.C. by holding Executive positions within the Association plus serving on and leading C.I.A.C. subcommittees. The division is strong in environmental management and as their contribution to the overall Sarnia site significant work has been done in reducing energy used in the production process, along with increasing recycled raw materials in some product grades.

Community involvement through either support of stakeholder issues in the Sarnia area or through the volunteer work by employees is a very strong. One area of involvement in particular is the teaching and mentoring expectation of company management. There were several examples of volunteer teaching at local schools, community college and at the university level in Calgary. At each of these teaching opportunities reviewed during the verification the Ethic of Responsible Care® was integral, and taught, as part of the course outline. As previously noted the OIMS Steering Committee oversees the integration of these principles into the practical applications of the OIMS for the Canadian operation.

**The team has listed as an improvement opportunity the requirement to develop a social responsibility statement as described in Appendix “A” of the Responsible Care® Commitments booklet.**

## **5. VERIFICATION TEAM CONCLUSION**

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the range of Findings Requiring Action identified during the verification, as summarized in the Executive Summary and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

## **COMPANY RESPONSE TO VERIFICATION TEAM REPORT**

On behalf of Imperial Oil Chemicals I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

I would like to thank the CIAC Responsible Care Re-verification team for the complete and thoughtful review of our managing systems and implementation of the Responsible Care expectations. The resulting report, in my view, reflects an accurate and objective assessment of our managing systems and our commitment to the Responsible Care ethic and principles for sustainability.

We are proud of our managing systems and our representation of the Responsible Care ethic, but also realize that there is always room for continuous improvements. I agree with the team's 'finding requiring action', and an action plan to address the finding will be developed and implemented to improve our managing systems.

We are pleased to see that the team was able to identify seven "successful practices" within our organization, and look forward to sharing them with other CIAC members to help them meet and further their Responsible Care commitments.

Imperial Oil Chemicals will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating sites.

We will give consideration to the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to the Findings Requiring Action identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and communicated to the verification team at the time of our next verification.

Mark Stumpf  
Manager, Petrochemicals  
Imperial Oil Limited  
July 18, 2013

## Interview lists

## A: Company Personnel

Name	Position	Location
Mark Stumpf	Manager, Imperial Oil Petrochemicals	Calgary
Peter Noble	Senior Regulatory Affairs Mgr.	Calgary
Frederik Donkers	Sarnia Chemical Plant Mgr.	Sarnia
David Jewell	Sarnia Site SSH&E Mgr.	Sarnia
Don Millett	Basic Chemicals and Intermediates Mgr.	Calgary
Jean Xu	Security and OI Leader	Sarnia
Jon Harding	Community & Aboriginal Affairs	Sarnia
David Shimoda	Area Fleet Manager - Chemicals	Calgary
Martin Bates	Product Supply Operations Mgr.	Calgary
Jim Belrose	Site Fire Marshall	Sarnia
Jonathan Glebe	EAG Regulatory Compliance and Waste Specialist	Sarnia
Scott Armstrong	Chemicals Quality Leader	Sarnia
Jim Snyder	Safety Advisor	Sarnia
Emile Courtemanche	Supply Analyst Intermediates	Calgary
Jim Sollen	Polymers and Aromatics Technical Leader	Sarnia
Ole Kihle	Sarnia Chemical Plant Technical Manager	Sarnia
Jessica Dillabough	Regulatory Affairs Advisor	Calgary
Chris Jay	Board Operator	Sarnia
Gary Capp	Board Operator	Sarnia
Robert Ballinger	Basic Chemicals & Intermediates Operations Leader	Sarnia
Chantal Desroches	Sarnia Site EAG Lead	Sarnia
Scott Crawford	JHSC member	Sarnia
Scott Butler	JHSC member	Sarnia
Shawn Minielly	JHSC member	Sarnia
Kevin Gelinas	JHSC member	Sarnia
Muriel Burnley	JHSC member	Sarnia

## B: External Stakeholders

Name	Company / Organization	Position	Location
Claude Henry	BCAP		Sarnia
Ralph Butt	BCAP		Sarnia
Kendra Ellis	BCAP		Sarnia
Iain Douglas	BCAP		Sarnia
Rakesh Taneja	BCAP		Sarnia
Margaret Ryan	BCAP		Sarnia
Mark Wetering	Lambton County	Emergency coordinator CVECO Chair	