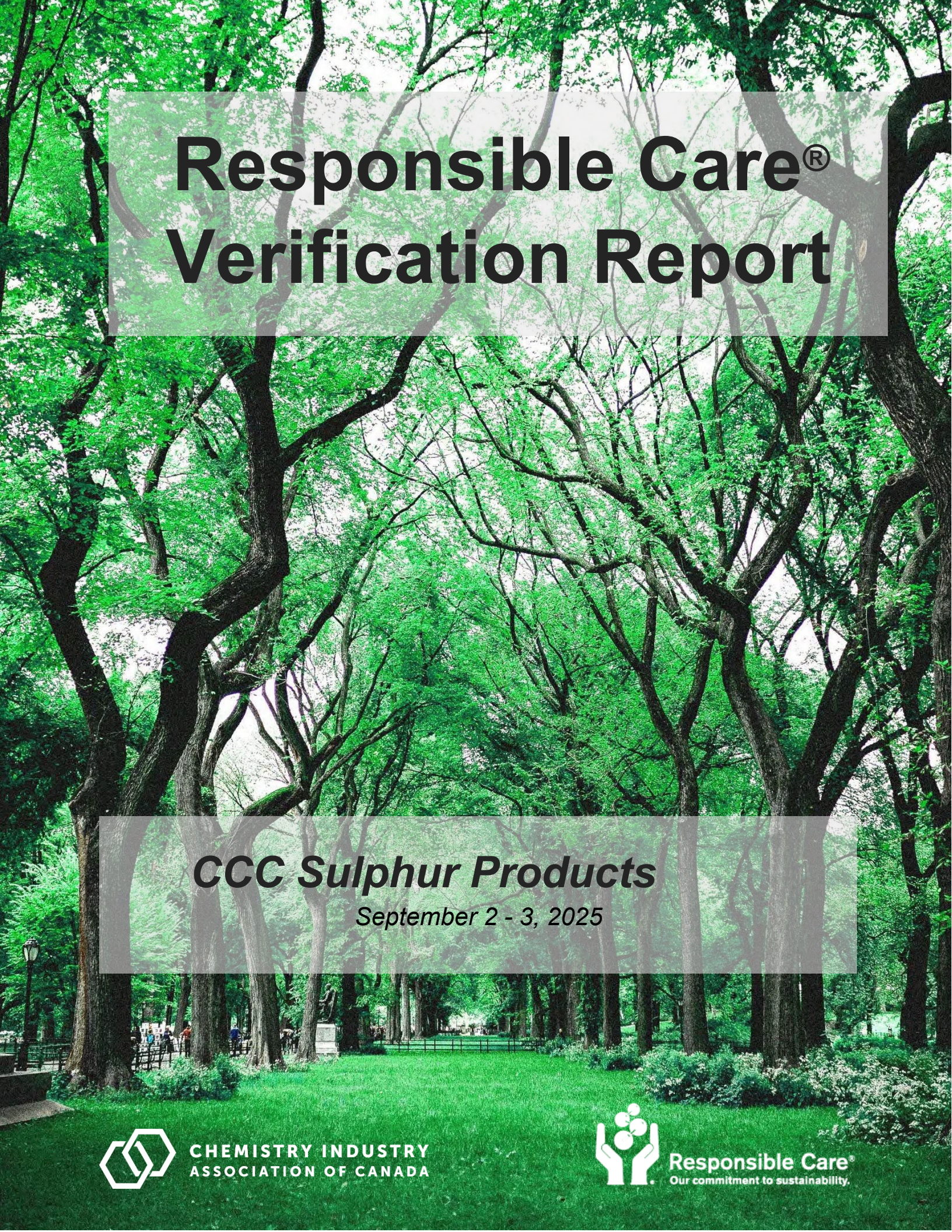

Responsible Care® Verification Report

CCC Sulphur Products

September 2 - 3, 2025

CHEMISTRY INDUSTRY ASSOCIATION OF CANADA

Responsible Care®
Our commitment to sustainability.

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This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care® commitments. The material in this report 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 that is the subject of this report to interpret and act on the report's findings and recommendations 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 CCC Sulphur Products. The verification was undertaken on September 2 -3, 2025 and precluded by a virtual Planning & Orientation meeting May 5, 2025. The verification team conducted an in-person meeting with the Joint Health & Safety Committee, dinner with the local CAP, virtual call with one of the CAP members who was unable to attend the CAP dinner meeting and several interviews with workers during a tour of the site.

This was the tenth Responsible Care verification completed for CCC Sulphur Products. The last verification was completed on April 7 - 8. 2022.

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 management systems related to the succession planning of a new executive contact, yet to be chosen, and the transition from CIAC's Responsible Care verification process to a new RC14001 audit system that includes Canadian requirements.

It should be noted that, as described in this report, the management and employees are continuing their tradition demonstrating the Responsible Care Ethic under the direction of the Chief Operating Engineer.
The annual Responsible Care attestation will continue under the supervision of the current President until the succession plan is completed.

The verification team found no Findings Requiring Action. The team has listed four Improvement Opportunities, two under the Operations and two under the Accountability codes, and four Successful Practices.

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 verification is complete, and no further involvement is required by the verification team.

Kristina Lee October 23, 2025
Verification Team Leader

For more information on this or a previous Responsible Care Verification Report, please contact:

Maninder Singh Rai
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CCC Sulphur Products
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Summary of Verification Team Observations

Findings Requiring Action
The verification team did not note any Findings Requiring Action.

Works in Progress
The verification team did not note any Works in Progress.

Improvement Opportunities
The following relate to suggested actions that could enhance the effectiveness of current programs.

1. **Succession Planning**
   The management system include aspects/impacts on communication & outreach to a new type of audience, support & innovation for the role of existing CAP members to be part of the journey and continuation of the trust between a new generation of companies such as Bridgeland and others.

2. **Follow up action items from CAP meetings**
   The CAP facilitator and company recapture the suggestions from the previous CAP meeting and pick up the notes from the October 6, 2022 meeting for an innovative and creative course correction.

3. **Inspections**
   JH&SC review its monthly inspection check list to include maintenance of areas to control vegetation and housekeeping items to determine purpose of unused equipment.

4. **Incident report tracking**
   Evaluate a tracking system that triggers the progress of incident reports prior to signoff.

Successful Practices
The following relate to actions that strongly support sustained excellence in performance.

1. The CN Safety Rail Award was given to CCC for the 24th consecutive year. The award recognizes CCC of shipping dangerous goods on CN's network while maintaining rigorous safety standards and minimizing non-accidental releases.

2. The savings of water use and electricity by innovative engineering design is a successful practice.

3. The presentation made by the President about risks of reduced buffer zone to the community from Hawkridge Home Development project demonstrates the Ethic of Responsible Care "doing the right thing and be seen to do the right thing".

4. The company is very fortunate because it has been able to find and sustain local CAP members with extensive experience and passion in the culture and history of the community. During the meeting it was very apparent that they embrace the ethic of Responsible Care in various levels within the community.

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 CCC Sulphur Products 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, CCC Sulphur Products 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. CCC Sulphur Products 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 on the CIAC website, or by contacting Jeff Stevens, Director, Responsible Care. jstevens@canadianchemistry.ca or (613)237-6215 x227

1.2 About CCC Sulphur Products

CCC Sulphur Products is located on a 4-acre site in Elmira, Ontario and employs 24 people. The site consists of the main sulphuric acid plant, a sodium bisulphite (SBS) plant, a separate corrosives packaging building, and a main office building.

The plant produces 25,000 MT (sulphur equivalent) of sulphuric acid, oleum and SBS annually, utilizing a sulphur burning operation. Molten sulphur is stored on-site as a raw material as well as distributed in the merchant market. Sulphuric Acid is stored on-site using 4 tanks with a capacity for 950 MT each and 3 tanks for storing Sodium Bisulphite with a total capacity of 370 MT. Product is shipped via railcars and trucks to customers in Ontario, Quebec, and Northeastern United States. Approved outside carriers are used to ship sulphuric acid, oleum, and SBS. It should be noted that since the company has reduced oleum sales, production has also reduced. Majority of the oleum that is manufactured is consumed in the process.

A variety of corrosives including sulphuric acid, hydrochloric acid, hydrofluoric acid, nitric acid, and caustic potash are stored for trans-loading into trucks or repackaging into intermediate bulk containers, drums, and carboys. CCC Sulphur Products sells by-product steam to a local user via pipeline to conserve sources of energy. CCC Sulphur Products maintains ISO 9001 and ISO 14001 certification.

CCC Sulphur Products was the first company in the world to pilot the Phase 1 verification process with the CCPA. The Phase 1 Responsible Care verification was completed in September 1996. This will be the 10th and last re-verification as the company transitions to RC14001.

1.3 About This Verification

The verification of CCC Sulphur Products was conducted on September 2 – 3, 2025 and included a prior Orientation and Planning meeting May 2025 with 3 members of the verification team. The September facility visit including meetings with the JH&SC, the CAP and virtual call with the fire chief.

This is the tenth verification exercise completed for CCC Sulphur Products. The last verification was completed on April 7-8, 2022. The verification team was comprised of the following individuals.

Kris Lee **Team Leader** **Public at Large Verifier**	**Alain Cyr** **CIAC** **Industry Verifier**	**Dr. Dan Holt** **Elmira Community Advisory** **Panel Community Verifier**

2. Team Observations on the Responsible Care Commitments (Codes, Benchmarks and Collective Expectations)

During the verification of CCC Sulphur Products, the verification team looked for evidence that the company was addressing the expectations documented in the CIAC Responsible Care Commitments (157 code elements plus 28 Benchmark and Collective Expectations, and Management Systems Guide).

As there were **no Findings Requiring Action**, in communicating its observations, the verification team will make repeated references to the following categories of observations:

1. **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.

2. **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.

3. **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 Responsible Care Management team meets at minimum quarterly to set and manage objectives documented under Org Chart A1.7. During the verification of CCC Sulphur Products and using the IG documentation, the verification team looked for evidence that the company was addressing the expectations in the Responsible Care Commitments (157 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 company focus for succession planning and community outreach.

This member company is committed to Responsible Care, is a strong supporter of all CIAC initiatives and readily participates in Association sub-committees including Process Safety, SHARE, EQC and sponsoring TRANSCAER® training events.

In addition, the President has been a member of the CIAC Board since 2018, co-chair of the Ontario Leadership Group and in 2025 Chair of the Ontario TRANSCAER committee. The team reviewed the previous report findings and opportunities to ensure that these items were addressed and updated into the policies C1 to C27.

2.1 Team Observations Concerning Operations Code

CCC have implemented the necessary management systems for responsible operations for the protection of people, property and the environment. This was primarily demonstrated through the use of effective Process Management System (PSM) elements at the site.

2.1.1 Operations Activities

The verification team looked at operations activities for shipment of incoming and outgoing of materials from the facility and operations of processes within the plant. Molten Sulphur is received primarily by tanker trucks and can also be received by railcar if required. Chemicals such as Hydrofluoric acid (HF), Hydrochloric acid (HCl) and Nitric acid (HNO3) used as part of the distribution business are received by tanker trucks. The team toured the control room, laboratory and external grounds which included the rail line, product loading and tank storage areas. CCC Sulphur Products fully meets the requirements of the Operations Code requirements.

During the visit the team observed that an area of the berms and stairs were in need of maintenance inspection to remove vegetation and cracks. Some equipment was found on site which did not seem to serve a purpose (example- used storage tank). Although this may not be safety related, it was visible to external view and could be perceived negatively by anyone passing by the site. These observations should be the role of the JH&SC during monthly inspections.

The site conducts process hazards assessments on a 5 year schedule using what if checklists. Following the site's Management of Change (MOC) process, before new or modified equipment is put into service, there is a pre-start up safety review done following an established checklist from the engineering review documentation. The site has identified a critical equipment list with appropriate preventative maintenance plans found in the site's computerized maintenance management system (CMMS). The site has also established a numerical process risk review criteria for determining relative risks at the site. Depending on the risk score of this evaluation, further activities may be carried out to mitigate the risk in question.

> ***Opportunity For Improvement***
>
> *JH&SC should review its monthly inspection check list to include maintenance of areas to control vegetation and housekeeping items to determine purpose of unused equipment.*

2.1.2 Safety and Security

The company meets CIAC expectations.

Visitors who enter the site must buzz the gate, identify the purpose of their visit to gain entry through a controlled gate. An electronic registry at the front office requires all personnel to check in at the beginning and end of each day.

As a part of company's Occupational Hygiene Program, site personnel are monitored bi-annually for medical assessments including pulmonary test, hearing test etc.

The company demonstrates leadership with the local community for safety and security in shipping of dangerous goods. This was validated with the CN Safety Rail Award for the 24th consecutive year.

Employees are encouraged to report any observations related to risk. There is a program in place called "Committed to Safety" for reporting job related hazards where they can add photos and a description about the hazard. These items will remain open until the issue is resolved. This is a continuous improvement initiative by management, which encourages employees to bring up any plant issue to management 24/7.

Despite the reduction in oleum sales, the company still has an oleum storage tank on site, with a dedicated containment area, which is their worst case scenario being the full release of the contents of the storage tank.

Successful Practices

The CN Safety Rail Award was given to CCC for the 24th consecutive year. The award recognizes CCC of shipping dangerous goods on CN's network while maintaining rigorous safety standards and minimizing non-accidental releases

2.1.3 Environmental Protection

The company meets CIAC expectations

The company has an ECA to discharge into the local waterway to Grand River via Canagagigue Creek.

The company meets Responsible Care expectations for Environmental management. During the team's tour of the external site there were no odours detected from the loading facility or the plant areas. The CAP members did not report any complaints about odours from the CCC Sulphur Products facility.

2.1.5 Resource Conservation

The company documents and benchmarks metrics for water and emissions through CIAC's NERM and NPRI reporting. The steam turbine project has generated annual savings in 53 500 MT water use and between 95% to 100% savings in use of electricity. The engineering department is challenging itself to increase electricity savings to 100% to be completely off the grid.

Successful Practices

The savings of water use and electricity by innovative engineering design is a successful practice.

2.1.6 Promotion of Responsible Care by Name

The team reviewed this section. As outlined in other sections, the company meets CIAC expectations.

2.2 Team Observations Concerning Stewardship Code

CCC have implemented the necessary management systems for responsible stewardship for the protection of people, property and the environment. This was primarily demonstrated through the use of effective Process Management System (PSM) elements at the site that conserve energy and water as outlined in the Resource Conservation section of the report.

The company uses a local transportation company for most of its operations. The owner of the company is a member of the CAP and has an excellent relationship with the company. A Responsible Care distributor is a major primary customer. As a small company, the company still maintains a strong Responsible Care footprint with its strategically selective albeit small value chain.

Successful Practices

See section "Resource Conservation"

2.2.1 Expectations of Companies

The company is very active with the municipality with regards to zoning bylaws that may impact risk to the community in reduction of buffer zones. The President made a presentation to Council about the risks of residential encroachment from Hawkridge development project. As well they have a very good relationship with the Woolwich Township fire department, whose chief is a member of the Community Advisory Panel. The team interviewed the fire chief and is satisfied that there is a robust system in safe guarding the community in case of emergencies.

Successful Practices

The presentation made by the President about risks of reduced buffer zone to the community from Hawkridge Home Development project demonstrates the Ethic of Responsible Care, "doing the right thing and be seen to do the right thing".

2.3 Team Observations Concerning Accountability Code

The Accountability Code defines expectations for communication and dialogue with communities local to company manufacturing and distribution operations and transportation corridors, as well as other stakeholders with an interest in company activities.

The company has a long standing and constructive relationship with the Elmira and surrounding community. This is validated by the fact that the CAP has been operating for 30 years since 1995. The community members are aware of the company and its long-standing history.

2.3.1 Operating Site Communities

For many decades CCC has been the beacon for Responsible Care in communication and outreach as an example to other companies. Although the company is still very committed to continue with its CAP and other local venues, it is making efforts to increase attendance of new members for the 2 meetings per year. It is important to note that CAP's are only one part of communication, dialogue and outreach. CAP members can be used to support, advise and supplement other communication agendas, venues and tools, as opposed to a stand alone 2 meetings per year activity. The team reviewed a community letter that was delivered to the community, outlining requirements for worst case scenario risk communication and CEPA – E2. COVID restrictions and sadly the passing of its long time facilitator impacted any new momentum. The team met with 5 CAP members and was very impressed with their passion for Responsible Care and importance of sustaining the Ethic.

The company is fortunate to have the local "ambassadors" who together have institutional memory about the uniqueness of Elmira and numerous community connections. It is hoped that innovative ways in the next chapter can be used with the advice of and support of these members. The previous report described in detail 4 suggestions on how the CAP could be reinvigorated. The team reviewed the October 6/22 minutes and noted that there had been extensive discussion as follow up to the verification. However, later meeting April 2023 did not have any reference to action items or status of any more discussion as follow up to the

verification. However, later meeting April 2023 did not have any reference to action items or status of any more discussion

Improvement Opportunities

The CAP facilitator and company recapture the suggestions from the previous verification and pick up the notes from the October 6, 2022 meeting for an innovative and creative course correction.

Successful Practices

The company is fortunate because it has been able to find and sustain local CAP members with extensive experience and passion in the culture and history of the community. During the meeting it was very apparent that they embrace the ethic of Responsible Care in various levels within the community.

3. Team Observations on the Company Management System

Based upon a plan-do-check-act continual performance improvement cycle, as defined in the CIAC Management Systems Guide, it is a requirement to have a self-healing management system capable of identifying and responding to deficiencies across the entire organization.

3.1 Observations on the Overall System

The verification team studied CCC 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:

3.2 Observations on the PLAN Step

The section of the system under PLAN is responsible for setting the company goals, its stakeholders and deliverables. It is both inward using internal resources such as Engineering review form, non-identical replacement form etc. and outward using 3rd party audits at a predetermined frequency based on the CHECK and ACT steps or as a result of incident follow-up verification reports, regulatory changes, complaints.

3.3 Observations on the DO Step

This is the step in the management system that converts the decisions of the PLAN step into action and ensures awareness and understanding by all involved. CCC has implemented a formal organizational structure that manages all the company functions including Responsible Care (*See A1.1: Company Governance and Structure)*.

3.4 Observations on the CHECK Step

All functions are reported annually to the board of directors and reviewed locally at shorter frequency. Examples are internal audits conducted annually and external every year for ISO9001 and ISO14001 and 3 years for CIAC Responsible Care. EHS performance targets are reviewed quarterly at the site and overall performance at the board of directors level. Employee targets are reviewed annually. Management Review meetings are conducted quarterly. This involves the periodic evaluation by top management to ensure the management system is suitable, adequate, and effective, and to identify opportunities for improvement.
During a document review, it was the team's opinion that the status of an incident review had not been entered into the data system within a reasonable timeline.

Improvement Opportunities

Evaluate an ongoing tracking system that triggers, within the company's timelines, the progress and/ or status of incident outcomes prior to sign-off.

3.5 Observations on the ACT Step

The company conducts quarterly Management System meetings, reviews audit findings and incorporates corrective actions into policies and procedures.

4. Team Observations on the Responsible Care Ethic and Principles for Sustainability

Work for the improvement of people's lives and the environment, while striving to do no harm.
Sustainability statement A1.8, There is a commitment to the safety program in which anyone on site can suggest an improvement idea or a safety related issue. Management reviews the idea and implements it if it is feasible to do so. Points are awarded to the employees whose ideas and suggestion are implemented.

Be accountable and responsive to the public especially our local communities, who have the right to know the risks and benefits of what we do.
CAP group meetings are held twice a year. The company is an active member of the township CAER group and available at Open houses for any questions. As active volunteers during the community siren test, they hand out letters in person. There is a 24-7 contact number on the company website.

Take preventive action to protect health and the environment.
The company operates under ECA's for Air, Noise and Water. Before water is discharged to the Grand River via the Canagigague Creek through its effluent discharge point, it is first tested to ensure it is safe to do so. Inline Sulphur Dioxide gas monitor is configured to trip the plant in case of an excursion. Boiler has multiple levels on safety documented under Quality and Environmental policies.

Innovate for safer products and processes that conserve resources and provide enhanced value.
Waste sulphur from Suncor is converted to usable sulphuric acid. Installation of the turbine has allowed company to be able to operate off the grid saving electricity, and paired with the Air-cooled condenser, reduced water usage and reduced effluent generation.

Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.
The following are examples of engagement with business partners such as use Suncor's waste (sulphur) to convert it to usable sulphuric acid and use of reconditioned drums such as Hydrofluoric and Nitric drums on site

Understand and meet expectations for social responsibility.
A 1.9 social responsibility statement, CAER group, volunteering in open houses, available to entertain questions from the public.

Work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirement and meet or exceed their letter and spirit.
Partnerships include CIAC leadership group, PSM and SHARE group and associate member of Responsible Distribution Canada (RDC). The company has been using Nimonik subscription for legal synopsis and updates. President participated in the Canadian Society for Chemical Engineering Conference in 2024 to aid in the promotion of Responsible Care to Chemical Engineering university students.

Promote Responsible Care and Inspire Others to Commit to These Principles.
Employees are encouraged to act as ambassadors both internally and externally for the company's products and services, their safe use and their sustainability. Company engages with business partners (e.g. suppliers and customers) to promote awareness of Responsible Care by name and encourage them to commit to the Responsible Care Ethic and Principles for Sustainability. Discussions are held through the value chain to build relationships and an understanding of the commitment to stewardship. To ensure that all pertinent information including balanced EH&S information, restricted uses/applications, end-use information, specific hazardous waste management information, sustainable and/or safer alternatives, etc. are communicated two-way throughout the value-chain. Same expectations apply to other parties who distribute or resell or products.

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 can address the range of Opportunities where applicable and relevant. The verification is complete, and no further involvement is required by the verification team.

Attachment 1

Company Response to Verification Report

On behalf of CCC Sulphur Products, I have reviewed this verification report. The observations and conclusions contained in the report have been discuss with the verification team.

CCC Sulphur Porducts will communicated 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 consider the Improvement Opportunities identified by the verification team and will assist the CIAC in communicating and sharing the identified Successful Practiced to other CIAC members. Our progress in implementing those plans will be discussed when preparing our annual Statement of Re-Commitment of Responsible Care and communicated to the verification team at the time of our next verification or audit.

Maninder Singh Rai
Production Manager & Chief Operating Engineer
CCC Sulphur Products
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Interview Lists

Company Personnel

Name	Position
Ron Koniuch	President, CCC Sulphur Products
Maninder Singh Rai	Production Manager & Chief Operating Engineer
Denton Hunt	Assistant Chief Engineer

External Stakeholders

Elmira	
Name	**Position**
John Miller	**CAP Facilitator**
Dr. Dan Holt	**Elmira Community Advisory Panel**
Bryan Cook	
Rick Clausi	
Kieran Martin	
Ron Martin	

RESPONSIBLE CARE®

Driving Safety & Sustainability

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