

PREPAREDNESS – DRILLS, EXERCISES AND REPORTING SUBSTANCE AND TRANSPORT ROUTE

Slide #2 - Agenda

- Thank you (facilitator) for the introduction. I am presenting two topics at this session:
 - Drills and exercises, and
 - Reporting of substance and transport route
- For drills and exercises we will cover the proposed types and frequencies, requirements as well as evaluation, coordination and scheduling of these drills and exercises.
- For the topic of reporting of substance and transport route, we will cover what currently exists and the amendments to the *Environmental Management Act*.
- I will then provide a summary of our policy intentions and provide details of next steps.
- At this point I will turn it over to you for questions.
- If there aren't many questions, I have a slide with engagement questions for us to discuss.

Slide #3 Drills and Exercises

- They are a part of preparedness.
- And help confirm that personnel are appropriately trained, and know how to access, use and maintain the spill related equipment.

Slide #4 – What are drills and exercises?

- *Drills* are typically activities to test a specific component or function of a spill contingency plan.
- Drills can focus on one or two key training skills or components of the plan.
- They can also be used to determine if a component can be executed as designed, or if more training is required, or to reinforce best practices.

Slide #5 - Exercises

- *Exercises* are staged in a realistic field environment and involve many participants.
- Personnel and resources may be mobilized and equipment deployed to the scene where actions would be conducted, as if a real incident had occurred.

Slide #6 – Full-scale/worst case exercise

- The full-scale exercise simulates reality by presenting complex and realistic problems that require critical thinking, rapid problem solving, and effective responses by trained personnel.

Slide #7 – Why do drills and exercises?

- Spill contingency plans will list personnel and required training.
- These trained personnel then participate in drills and exercises to test their knowledge and skills as well as the equipment and resources specified in the plan.
- Together these pieces lead to preparedness.
- Essentially drills and exercises help test spill contingency plans.
- Testing plans is necessary to confirm that the resources identified in a plan can come together and can effectively respond to a variety of spill sizes.
- It would be inappropriate to wait until an actual spill to determine the effectiveness of a plan.

Slide #8 – Before Amendments

- Before the *Environmental Management Act* did not require drills or exercises.

Slide #9 – After Amendments

- After the amendments to this Act:
 - regulated persons are now required to have and test spill contingency plans
 - employees must engage in training drills and exercises in a prescribed manner and frequency.
- This means that regulations will be developed for drills and exercises.
- First we will draft the policy before building these regulations.
- The proposed policy is presented in the next few slides.
- This policy is in the third intentions paper and we would like your input on this proposed policy.

Slide #10 – Who does drills and exercises?

- Regulated persons are required by the amendments to have personnel engaged in training drills and exercises.
- My colleague Ben is presenting a session who regulated persons are.
- These regulated persons are required to prepare for a spill and one of the ways of preparing is through drills and exercises.

Slide #11 – Other jurisdictions

- Many of other jurisdictions that require plans also specify drills and exercises.
- I don't expect you to read the table, just an illustration of the other jurisdictions we have reviewed.
- The following table highlights the jurisdiction and either the legislation, rules or guidelines that specify drills and exercises for that jurisdiction.
- In BC you may be familiar with the Emergency Management Regulation under the Oil and Gas Activities Act.
- Or on a federal level the guide to emergency response assistance planning for those transporting dangerous goods.

Slide #12 – Other jurisdictions - details

- As you can see in this table, certain jurisdictions have specified a type of drill i.e. tabletop versus deployment, frequency say annual or once every 3 years and the length of the testing cycle.
- So what are we proposing for BC?

Slide #13 – Proposed types and frequency

- The following types and frequencies are proposed in the third intentions paper and summarized in this table.
- We are proposed is a three year testing cycle similar to that of federal response plans, our neighbouring province Alberta and neighbouring state of Washington.
- For the types of drills and exercises, the first type is a table top drill.
 - We are proposing an annual tabletop drill.
 - This is consistent with other jurisdictions.
 - Remember a drill focuses on one or two functions.
 - Here personnel will say test communications or notifications of the spill contingency plan.
- The second is a deployment drill.
 - Here the drill operational for example the deployment of spill response equipment and not a tabletop drill.

- The proposed frequency for this is also annual.
- You will notice deployment exercises are listed along with deployment drills.
 - Here a deployment exercise takes place in the field as if a real incident was occurring and involves key personnel deploying equipment, following plan procedures and response actions.
 - As far as frequency the proposed policy is to have a deployment drills or exercise annually except the year of a worse-case spill exercises.
 - It is likely that almost all the plan will be tested during this exercise so no need to require it twice in one year.

Slide #14 – Potential ways to meet requirements

- Government recognizes that there is an enormous amount that can be learned from an actual spill.
- Other jurisdictions like the State of Washington enable a plan holder to meet a drill or exercise requirement if that has been utilized during an actual spill.
- Here is where good record keeping will help confirm that the drill/exercise requirement was met through detailed records of the drill/exercise and lessons learned during the spill.
- We are also considering the following as ways to meet drill and exercise requirements and seek your feedback:
 - The first is that the regulated person could meet this requirement by hiring a contractor, PRO or qualified professional to meet this required.
 - The second is that the PRO would conduct such an exercise to test the area response plan and, if that the regulated person operates or conducts business in this designated area, and participates in this full deployment exercise could a similar requirement for that three-year testing cycle.
 - Another possible allowance could be conducting a drill or exercise for another regulator say it you have an Emergency Response Assistance Plan under Transport Canada, Environmental Emergency Plan under Environment and Climate Change Canada or Response Contingency Plan under the BC Oil and Gas Commission.
 - Here's another possibility, the regulated person completed a drill or exercise that tests the plan but was in another jurisdiction at the time. Not sure if this is a feasible option but we thought we'd put it out there.

Slide #15 – Drills and exercises evaluation

- Following each drill and exercise, the regulated person will be required to prepare a report self-evaluating their performance.
- Contents of this evaluation are listed in Appendix F of the third intentions paper.
- This record can then demonstrate that requirements were met.
- Government can confirm compliance by reviewing records in its oversight role.
- This common practice.
- Transport Canada requires holders of Emergency Response Assistance Plans (ERAPs) under the Transport of Dangerous Goods Regulations to maintain records on training and exercises and be made available upon request.
- Alberta's Directive 071 also requires records be kept of plan updates, training, meetings and exercises and retained for a period of three years.
- State of Washington's Washington Administrative Code 173-182 Oil Spill Contingency Plan requires training records be maintained for five years and be available upon request. It continues to state that records related to equipment maintenance as well as drills could be inspected.

- We are also proposing that if a group of regulated persons complete the same drill or exercises, each could use the same self-evaluation to demonstrate compliance.

Slide #16 – Coordination and scheduling

- There is a session on spill contingency plans but in case you haven't got to it yet, these plans will list personnel and training details.
- Government is proposing a website with a calendar to schedule drills and exercises. We will explore this type of online tool.
- This would enable those needing to participate in the drills/exercises to plan to attend or participate.
- It also is a great tool to avoid a number of drills or exercises getting scheduled on the same day or week.
- Another proposed policy that occurs in other jurisdictions is government's ability to test plans through announced or unannounced drills and exercises.
- We envision that the same or similar evaluation used. There's value in providing this feedback highlighting key areas of success and recommendations for improvement. This could even be published on a website.
- Maybe? Let us know what you think.

Slide #17 – Substance and transport route reporting

- Many agree that knowing the substance being transported is critical for emergency responders and planners to prepare for and respond to spills and accidents.
- This information would help first responders and communities safely prepare and respond to spills by having the right equipment or resources nearby or taking the right actions.
For example whether to evacuate or shelter in place.

Slide #18 – Reporting substance information and transport route

- Not only does it assist responders but this information can protect the lives of people working or living near transportation routes as well as critical infrastructure and the environment.
- For example certain substances are more volatile or flammable and will need to be addressed differently to those substances that are not as volatile or flammable.
- Jurisdictions often require substance information be reported as part of spill preparedness or that certain sectors do this already:
 - The Transportation Community Awareness and Emergency Response initiative (TRANSCAER®) is led by the Chemistry Industry Association of Canada (CIAC) and the Railway Association of Canada (RAC).
 - TRANSCAER® members work with municipalities, emergency responders, and residents in communities along transportation routes, to make sure they are informed about the products being moved through their area, and are prepared to respond to potential incidents involving dangerous goods.
 - Transport Canada will continue mapping work on transportation routes and include volumes of Class 3 Flammable Liquids as well as those additional products that may be transported in large volumes by rail in tank cars. This was recommended in the Third Quarterly 2015 Report and Recommendations from the Emergency Response Task Force for the Transportation of Dangerous Goods, under recommendation number 22.
 - Recently the Railway Association of Canada (RAC) announced the release of a mobile application "AskRail" for first responders to access real-time train consist information.
 - Now let's get to the lay of the land in BC.

Slide #19 – Before Amendments

- Before the amendments the *Environmental Management Act* enabled government to have access to information on a substance that could be at risk of escape or spill through an order on a case-by-case basis.
- This delays access to such critical information leaving the province, responders and communities in the dark so to speak.

Slide #20 – After Amendments

- After the amendments, the Act enables that substance information such as its properties, volumes, transport routes be reported for those regulated persons and when the director has reasonable grounds for non-regulated persons.
- An example of this would be a container is about to spill into a river near an industrial or drinking water intake – the contents of the container would assist us and responders in whether this creates a risk to the industrial or drinking water treatment plant.
- This then leads to our policy development.

Slide #21 - Reporting

- There is a trend of transparency as seen in the rail sector. Some sectors are going this way but we need to ensure that we all have access to this information.
- Other jurisdictions have requirements to report information but we, like local government or First Nations, don't that authority.
- Government is proposing that regulated persons report information about substances, volume and transportation route for prescribed substance.
- This information could be reported at regular intervals or more if substance or volumes change.
- This information could be provided on a regular basis or sooner if the volume increases over a specified percentage or if the substance changes.
- This would assist responders in ensuring the applicable notifications and actions are taken and the appropriate equipment is on hand.
- The options for an initial report could be monthly, quarterly or annually.
- Any updates could be submitted either semi-annually, annually or only when there are significant changes.
- If this information is accessible by GIS mapping or mobile phone apps, this would meet our policy objective.
- If you have any input, please either provide on a sticky note or online on the third intentions paper's website.

Slide #22 – Summary

- Here's a summary of the proposed policy in the third intentions paper and covered earlier in this presentation.
- For drills and exercises we are proposing a 3 year testing cycle.
- The types of drills and exercises proposed are tabletop and deployment.
- The frequency being annual for tabletop and deployment with one of the deployment exercises to be a full-scale or worst case deployment exercises.
- We are considering options for meeting these requirements.
- The third intentions paper has a draft self-evaluation of drills and exercises with a proposed record keeping requirement.
- Also proposed is the coordination and scheduling of drills and exercises through a website calendar.
- The second topic covered in my presentation was the reporting of substances and transport route information.

- This policy is in early phase of development – we are seeking your input on the frequency of reporting, how to report changes and how best to streamline where other self-reporting that exists.

Slide #23 – Next steps

- You might be wondering what our next steps are.
- After the workshop we will be collecting your input or feedback.
- We plan to schedule technical working groups
- The third intentions paper is online along with consultation questions.
- I encourage you to submit your input online. The deadline for submissions is June 30th.
- Once we have reviewed consultation feedback we can confirm our policy and prepare for regulations.

Slide #24 – Thank you

Slide #25 – Questions?

- I'm sure you have questions. We have time left for you to ask questions.
- If we have time then we have a few questions.
- If we run out of time, please feel free to capture your thoughts on sticky notes and place them on the flip charts.