FIRST TIME USER GUIDE
EVENT REPORTING

Contents
Introduction .................................................................................................................................................. 4
Contact Us .................................................................................................................................................... 4
Immediately Reportable Events .................................................................................................................. 5
Getting Started ........................................................................................................................................... 6
   Email Confirmation ................................................................................................................................... 7
Navigating in OERS ........................................................................................................................................ 7
Reporting Specific Event Types ................................................................................................................... 8
   Key Things to Know About the Event Types Page .................................................................................. 9
All Event Types - Company and Regulations ............................................................................................... 9
   Key Things to Know About the Company and Regulations Page ........................................................... 9
All Event Types - Initial Report .................................................................................................................... 10
   Key things to know about the Initial Report Page .................................................................................... 10
Notification of Contamination (NOC) - Initial Report ................................................................................. 11
   Key Things to Know About the NOC Initial Report Page ....................................................................... 11
Incidents - Circumstances Page ................................................................................................................... 12
   Key Things to Know About the Circumstances Page .............................................................................. 12
All Event Types - Location Page .................................................................................................................. 13
   Key Things to Know About the Location Page ....................................................................................... 14
All Event Types - Initial Submission ............................................................................................................ 15
   Key Things to Know About the Initial Submission Page ....................................................................... 15
Continuing Your Report – Preparing for “Final Submission” ..................................................................... 16

RDIMS #1052950
Introduction

The Online Event Reporting System (OERS) was created to allow companies to report regulatory events directly to the National Energy Board (NEB). OERS is part of a larger system called the Operations Regulatory Compliance Application (ORCA) which also allows companies to review their compliance verification activity reports, submit and view the status of condition filings and interact with NEB staff. In this manual you will find instructions and guidance on how to use OERS for to report regulatory events and the information required by the system.

For more information on the types of events required to be reported and for additional guidance on those event types please see the National Energy Board Event Reporting Guidelines or the NEB Remediation Process Guide.

Contact Us

If you have technical questions related to the specific regulatory event you have already reported please use the “Send a Message” function in left-hand menu of the system. This will direct your inquiry automatically to the staff assigned to your file.

This manual covers key functions of OERS. If you are having trouble reporting an incident and you cannot find the information you require in this manual at any time you can email DLERSSupport@neb-one.gc.ca. This is a monitored email box and NEB staff will respond within 1 business day.

If OERS is not functioning for any reason and you have to report an event immediately you can call the Transportation Safety Board (TSB) reporting hotline at (819) 997-7887. The TSB will then inform the NEB.
**Immediately Reportable Events**

In addition to reporting to OERS, some events require phone notification to the TSB. If this is the case you will get a message across the top of the screen in yellow indicating you should call the TSB. The incidents that require phone notification are outlined below.

Where regulations require an event to be reported “immediately”\(^1\), companies must also consider whether the event meets any of the following definitions:

- **An Incident that Harms People or the Environment:**
  - a death;
  - a serious injury (as defined in the OPR or TSB regulations);
  - an unintended or uncontrolled LVP hydrocarbon release in excess of 1.5 m\(^3\) that leaves company property or occurs on or off the right of way;
  - an unintended or uncontrolled sweet natural gas or HVP release >30,000 m\(^3\);
  - any unintended or uncontrolled release of sour natural gas or hydrogen sulfide; and/or
  - a significant adverse effect on the environment.

- **A Rupture:**
  - an instantaneous release that immediately impacts the operation of a pipeline segment such that the pressure of the segment cannot be maintained.

- **A Toxic Plume:**
  - a band of service fluid or other contaminant (e.g. hydrogen sulfide or smoke) resulting from an incident that causes people, including employees, to take protective measures (e.g. muster, shelter-in-place or evacuation).

Where an event meets any of the above definitions, companies are required to notify the TSB Reporting Hotline at (819) 997-7887. Subsequently, the company is required to input the details required by both the TSB (see TSB regulations) and the NEB into the OERS. The phone notification and the input of information into OERS are required to occur as soon as possible and no later than three hours of the incident being discovered. The goal of the initial phone notification is to allow the relevant agencies to mobilize a response to an incident, if required. Note that OERS will automatically determine whether the event meets the definition of an “Incident that Harms People or the Environment”, however the

\(^1\) Or other equivalent term.

RDIMS #1052950
company will be responsible for specifically indicating whether the incident meets the definitions of “Rupture” and “Toxic Plume”.

For all other events that do not meet any of the definitions in this section, companies are not required to phone the TSB Reporting Hotline but must report the event as soon as possible and no later than twenty-four hours after the event was discovered.

**Getting Started**

To report a new event, click the Continue button at the bottom of this page. You will be asked to provide some pertinent information, including an email address. The email address will be used to allow the system to send you a link to access the full Event Reporting System (ERS) portal. Once complete, click “Save and Next”.

![Event Reporting Form](image)
**Email Confirmation**

A message with the link to the ERS portal will be sent to the email address that you provided. If the message does not appear in your Inbox, please check to see if it was automatically moved into your Junk E-Mail or another folder.

Clicking the link in the email confirmation will bring the user into the full ERS portal, where you will be asked to enter further data.

**Navigating in OERS**

- You can use the left-hand menu or the workflow buttons at the bottom of each page (i.e. “Next” or “Save and Next”) to navigate through the system.

- Once you receive the email link above you can return to the system as needed to update information until such time “Final Submission” is selected. After “Final Submission” is selected you will no longer have access to the file.

- If you require access to the file because “Final Submission” was selected by accident or other pertinent information was left out of the report you can contact DLERSSupport@neb-one.gc.ca and reference the event number and reason for the request in order to gain access to the system using the link the system provided.

- OERS requires certain pieces of data, if that data has not been included it will display an error message and outline what needs to be corrected.
Reporting Specific Event Types

The first screen you will see allows you to select the event types you want to report. You may report multiple event types within one regulatory event. For example you can select “Fatality” and “Release of Substance” under “Incident” or you can select “Construction of a Facility” and “Vehicle Crossing” under “Unauthorized Activity”. You cannot select multiple event types across several regulatory events. For instance you cannot select “Release of Substance” and “Vehicle Crossing” as they belong to discrete regulatory events (i.e. incidents and unauthorized activity respectively).

<table>
<thead>
<tr>
<th>Is this an exercise? *</th>
</tr>
</thead>
<tbody>
<tr>
<td>No ☑️ Yes ☐</td>
</tr>
</tbody>
</table>

What are the event types that you are reporting? *

- **Unauthorized Activity (check all that apply)**
  - Damage Prevention Regulations
    - Vehicle Crossing
    - Ground Disturbance
    - Construction of a Facility
  - Incident (check all that apply)

- **Regulations under the NEB Act or TSB Regulations**
  - Fatality
  - Serious Injury (NEB or TSB)
  - Explosion
  - Fire
  - Release of Substance
  - Operation Beyond Design Limits
  - Adverse Environmental Effects
  - Restriction to the Safe Operation of Transportation by a Pipeline
  - Geotechnical, Hydraulic or Environmental Activity Threatens the Safe Operation of a Pipeline
  - Interruption of Pipeline Operations

- **Regulations under COGO Act**
  - Loss of Well Control
  - Missing Person
  - Imminent Threat to Safety of Person
  - Imminent Threat to Safety of Support Craft
  - Imminent Threat to Safety of Installation
  - Threat to Environment
  - Unauthorized Discharge (Pollution)
  - Damage to Property
  - Damage to Pipeline, Equipment, or Installation

- **Notification (check only one)**
  - Onshore Pipeline Regulations
    - Operations and Maintenance
  - Processing Plant Regulations
    - Emergency Flaring
    - Hazard Identification
    - Suspension of Operations
  - Damage Prevention Regulations
    - Suspension of Caravan
    - Damage to Pipe
  - Remediation
    - Notice of Contamination

RDIMS #1052950
**Key Things to Know About the Event Types Page**

1. If you are using OERS to report an “Emergency Response Exercise” you can toggle the relevant field to “Yes”. When this is done the notification is sent with the prefix “EXERCISE EXERCISE EXERCISE”. The NEB encourages its regulated companies to make its exercises as realistic as possible and therefore encourages the use of OERS in exercise scenarios.

2. You can select multiple types for a given regulatory event. Using the screen shot above as an example, a regulatory event is indicated by the blue highlighted heading (e.g. “Incident”). Within that heading you may select all the types that apply.

**All Event Types - Company and Regulations**

The next screen asks about the company responsible for the particular pipeline on which the incident occurred and the regulations the responsible company is reporting under.

When done entering company information, click “Save and Next” using the workflow buttons at the bottom of the page.

**Key Things to Know About the Company and Regulations Page**

1. If you are unsure which regulation your company is reporting under you should ask your company’s Regulatory Advisor (or equivalent role).
2. If you believe that there should be more or fewer options available under the “Select all regulations that apply…” section, please contact the NEB.

All Event Types - Initial Report

At this point the system directs users to input information based on the event types they are reporting. The required information for incidents, for example, is somewhat different than that of unauthorized activities. The system provides on screen instructions to help the user navigate the system. Rather than walk through each individual regulatory event type, this guide will provide an overview of the screens across all event types up to and including “initial submission” of the event.

Key things to know about the Initial Report Page

This page is required for all regulatory events. There are some key things to know about this page:

- If you have selected a field that indicates the event should be reported by phone you will receive the banner in yellow at the top of the page below (see screenshot below). If you receive this banner you should call the TSB.

- The NEB has directed companies to take a precautionary approach to reporting. As a result the NEB is aware that companies will be reporting a suspected event prior to confirming the final details. Companies can toggle the “Is this a Precautionary Report” field to indicate to the NEB that they are reporting from a precautionary standpoint. For more information on precautionary reporting please see the NEB Event Reporting Guidelines.
Notification of Contamination (NOC) - Initial Report

The NOC Initial Report page is substantively different enough from the other event types that it warrants special mention. At this point the system directs users to input information about the contamination.

Key Things to Know About the NOC Initial Report Page

1. The one sentence description of the site should include the major contaminant and a few words that describe the location. For example, ‘Hydrocarbon contamination at XXX compressor station’ or, for a facility, ‘Amine contamination next to the XX utilities building in the SW corner of the fenced yard’.

2. The date the contamination was first discovered is the date upon which the potential for contamination was first discovered. The date the contamination was confirmed is the date upon which test results confirming contamination above criteria were received by the company, or a third party working on behalf of the company.
Incidents - Circumstances Page

This page is required for all incidents, but is not required for unauthorized activities or events types under the “Notification” category. The circumstances page allows the company to provide more information on the specific event type they are reporting. For example if the company is reporting a “serious injury” the circumstances page will allow the company to report what type of “serious injury” occurred. The circumstances page will also trigger the system to require additional information based on the user’s input. For example selecting “Yes” to “Residual Environmental Impacts” will trigger a requirement to input information about those impacts and any Notifications of Contamination under the NEB Remediation Process Guide.

Key Things to Know About the Circumstances Page

1. The “Equipment” section is required more often than companies believe it is. It is required for almost all release of substance, fire, explosion and operation beyond design limits incident types. If you are unsure whether this field is required, leave the answer as “Yes” and contact the NEB. You will have the ability to change this field at a later date.

2. As of April 1, 2018 companies are required to follow specific calculations in order to report volume and rate for releases of high-vapour pressure hydrocarbons and natural gas. For more information see the NEB Event Reporting Guidelines.
All Event Types - Location Page

The location page is required for all events. It allows companies to report details of the location to the NEB. The user can use the following as guidance for land use types:

1. Either a pipeline or a facility must be identified on the location page. If you cannot find the information you’re looking for, you can select “Not Listed” and enter some basic information about the pipeline/facility. The NEB will then reconcile the information with its databases.

2. For “What is the populated centre nearest to this location?” please only enter the name of the hamlet, village, town etc. Do not enter the province.

3. The “View Location in Google Maps” function will only work if you have entered GPS coordinates into the system.

4. If you have selected a facility, the system will auto-populate the GPS coordinates with the information the NEB has on file. If you notice this information is incorrect, please contact the NEB.

5. Use the definitions below as guidance to assist in selecting the appropriate land use category.
   a. Agricultural Land –
      i. Lands which are either currently cultivated or show signs of recent cultivation (i.e. within the past 5 years; or,
      ii. Lands which have not been recently cultivated (i.e., within the past 5 years), and where sod has developed or is beginning to develop and which is used for animal grazing or other agricultural purposes.

   b. Protected Area –

      Lands with protective designations, as identified in government regulation, and for which development is not permitted or is limited. These could include, but are not limited to: national, provincial and regional parks; federal and provincial lands with protective designations (e.g., wildlife preserves, ecological reserves); and designated Critical Habitat for species on Schedule 1 of the Species at Risk Act.

   c. Non-developed Land

      Lands which remain in a relatively natural state. These could include, but are not limited to native prairie and forest land. If the land use falls into both the Protected Area and Non-developed Land categories, select ‘Protected Area’.

   d. Developed Land – Industrial
Lands where the primary activity involves the production, manufacture, or construction of goods.

e. Developed Land – Commercial

**Key Things to Know About the Location Page**

6. Either a pipeline or a facility must be identified on the location page. If you cannot find the information you’re looking for, you can select “Not Listed” and enter some basic information about the pipeline/facility. The NEB will then reconcile the information with its databases.
7. For “What is the populated centre nearest to this location?” please only enter the name of the hamlet, village, town etc. Do not enter the province.

8. The “View Location in Google Maps” function will only work if you have entered GPS coordinates into the system.

9. If you have selected a facility, the system will auto-populate the GPS coordinates with the information the NEB has on file. If you notice this information is incorrect, please contact the NEB.

All Event Types - Initial Submission

OERS is designed to handle one or two step reporting functions. The “Initial Submission” is the first step in the two step reporting process for Incidents and Unauthorized Activities.

Key Things to Know About the Initial Submission Page

1. If you are seeing the “Initial Submission” page, it is because the event type you are reporting requires a two-step reporting process. If you have selected an event type that requires a single-step notification, you will not see “Initial Submission” and you will skip directly to “Final Submission”.

2. The pages that exist below “Initial Submission” on the left-hand navigation menu are required, however they are not required to be completed immediately. For more information on timelines for specific event types please see the NEB Event Reporting Guidelines.

3. After you click “Submit” using the workflow buttons at the bottom of the page (see screen shot above), you will receive a notification indicating the initial submission was successful. If you do not receive a notification, please contact the NEB.

4. At this point an internal notification is also sent within the NEB. At any point after initial submission, you may receive a follow-up communication from NEB staff. This is especially true
of events that meet any of the definitions under “Immediately Reportable Events” in this document.

**Continuing Your Report – Preparing for “Final Submission”**

Any pages located below “Initial Submission” on the left-hand menu are part of the second step in the reporting process. At this point the pages differ greatly depending on the regulatory event of event being reported (i.e. Incident or Unauthorized Activity). This user guide will now walk through completing these pages for each of the regulatory events.

**Unauthorized Activities – Unauthorized Activities Details Page**

This page allows companies to give more details on the unauthorized activity that occurred. Some examples of questions are located in the screen shot below.

![Screen Shot of Unauthorized Activities Details Page](image-url)
Unauthorized Activities – Violator Page

The Violator page allows companies to report details on the party that undertook the unauthorized activity.

**Key Things to Know About the Violator Page**

1. The “Project Owner” is the party who the violator was carrying out the work on behalf of. In the case of a landowner doing work on their own, they are both the violator and the project owner. In the case of a contractor doing work on a storm drain, the contractor is the violator and the municipality is the project owner.

2. Pay close attention to “Is this a repeat occurrence...”. NEB staff will follow up with all repeat offenders as they are all considered high-risk.
Unauthorized Activities – Follow Up Screen

The follow up screen allows companies to provide additional narrative around what the regulated company did in relation to follow up.

Key Things to Know About the Follow Up Screen

1. Err on the side of including more detail on the follow up the company completed. This will reduce the amount of follow up questions that NEB staff require the company to answer.
**Incidents – Immediate Causes and Basic Causes**

The NEB uses Canadian Standards Association (CSA) Z662 Annex H and Det Norske Veritas (DNV) Systemic Cause Analysis Technique (SCAT) causes within OERS. Use of another root cause technique (e.g. TapRoot) does not preclude the ability of a company to submit causes. The NEB acknowledges that the cause wordings may differ between the techniques however the vast majority of causes have equivalents in each of the cause techniques.
Key Things to Know About the Immediate and Basic Causes Pages

1. You can select as many immediate and basic causes as you believe are required for the incident.

2. It is recommended that for each cause selected you include a narrative explanation in the “Provide justification…” box.

3. If you are having problems finding a cause you think should be there, use the “Send a Message” function to contact the staff assigned to your file.

Incidents – Preventative and Corrective Actions

This is required for all incidents. The NEB expects that actions will be taken to address each cause selected. The NEB is aware that there are different definitions of preventative and corrective actions. For more information on how the NEB defines corrective and preventative actions please see Appendix 1 of the NEB Event Reporting Guidelines. For scenario-based guidance on selecting preventative and corrective actions see Appendix 1 of this document.
Key Things to Know About Preventative and Corrective Actions

1. The NEB expects that the actions selected address the causes selected.

2. It is recommended that for each action selected you include a narrative explanation in the “Provide justification...” box.

3. If you are having issues selecting actions, first consult Appendix 1 of this document and then contact the investigator on your file using the “Send a Message” function.

Incidents – Environmental Impact

If the user indicated that “Residual Environmental Impacts” were present (Incidents – Circumstances Page), this page is mandatory. Depending on your answers to the screening questions the system may determine that a Notification of Contamination (NOC) and subsequent environmental remediation is required. The system will automatically generate the NOC on the user’s behalf and send notification to
the email the user put into the system. For more information on the remediation process in general, including NOCs, please refer to the NEB Remediation Process Guide.

Key Things to Know About Environmental Impacts Page

1. This page is only required if you answered “Yes” to “Residual Environmental Impacts” on the “Circumstances” page.

2. The system will automatically generate an NOC on behalf of the user and send it to the email on file for the incident. The NOC unique numbers are formatted as “REMYEAR-###” (e.g. REM2018-001).

3. More information is required for the NOC and may require that the NOC be distributed internally within the users company.

Incidents – Equipment and Component Involved

This section is only required if “Yes” is selected in response to the “Was Equipment or Component...” question on the “Initial Report” page. This page allows companies to provide details on the physical item that failed. The items are grouped into categories. As many selections can be made as are required.
Key Things to Know About the Equipment/Component Involved Page

1. It is recommended that for each selection you provide a brief narrative at the bottom of the page.

Incidents – Operating Conditions

This section is only required if “Yes” is selected in response to the “Was Equipment or Component...” question on the “Initial Report” page. This page allows companies to provide details on the operating conditions at the time of the incident.
Key Things to Know About the Operating Conditions Page

1. Provide as much detail as possible. While none of the fields are strictly enforced as mandatory. Lack of detail in this section is one of the most common source of information requests to companies.

Incidents – Welds and Coatings Page

This section is only required if “Yes” is selected in response to the “Was Equipment or Component…” question on the “Initial Report” page. This page allows companies to provide details on the welds and coatings (if applicable) at the time of the incident.
**Key Things to Know About the Welds and Coatings Page**

1. Provide as much detail as possible. If there were no welded or coated components involved, leave blank and move to the next page.

**Incidents - Maintenance History Page**

This section is only required if “Yes” is selected in response to the “Was Equipment or Component...” question on the “Initial Report” page. This page allows companies to provide details on maintenance history of the equipment/component at the time of the incident.
**Key Things to Know About the Maintenance History Page**

1. Provide as much detail as possible. While none of the fields are strictly enforced as mandatory. Lack of detail in this section is one of the most common sources of information requests to companies.
NOC – Scenario

The scenario page allows the company to provide more information about the contamination being reported. For example if the company is reporting a “NOC” the circumstances page will allow the company to report what type of contamination occurred. The circumstances page will also trigger the system to require additional information based on the user’s input.
Scenario

Please identify all contaminants confirmed to be present at the contaminated site: *

☐ Petroleum Hydrocarbons (PHCs)
☐ Polyaromatic Hydrocarbons (PAHs)
☐ Benzenes, Toluene, Ethylbenzene, Xylenes (BTEX)
☐ Volatile Organic Compounds (VOC) other than BTEX
☐ Semi-Volatile Organic Compounds (SVOC)
☐ Solids
☐ Methy Tertiary Butyl Ether (MTBE)
☐ Petroleum Neutrals (PNs)
☐ Metals
☐ Glycol
☐ Amine
☐ Phenes
☐ Sulphur
☐ Petroleum Hydrocarbons
☐ Light Non-aqueous Phase Liquid (LNAPL)
☐ Dense Non-aqueous Phase Liquid (DNAPL)
☐ Other

Provide an initial estimate of volume of contaminated soil (m3): *

Please select the source of contamination

☐ Soil
☐ Sediment
☐ Groundwater
☐ Drinking water wells
☐ Surface water
☐ Soil vapour

Briefly describe the extent of contamination *

Is this contaminated site within 30 m of a wetland or waterbody? *

☐ Yes

Please identify all receptors potentially affected by contaminations *

☐ Humans
☐ Terrestrial wildlife
☐ Aquatic
☐ Vegetation

Have landowners been notified and consulted? *

☐ Yes

Provide a complete record of landowner consultation, any concerns that have been identified and measures taken to address these concerns, like the Upload Document page to include a spreadsheet or other document, if applicable *

Have any other third parties (Indigenous Peoples, municipalities, etc.) expressed concerns about this contaminated site? *

☐ Yes

Key Things to Know About the NOC - Scenario Page

1. To describe the extent of contamination, provide brief details regarding the depth and spread of contamination in the affected media, as delineated at the time of NOC submission.
2. Definition of a receptor: The person or organisms, including plants, subjected to chemical exposure. If “terrestrial wildlife” is selected, there is no need to identify the minimum distance between the receptor and the contamination.
3. Stakeholder engagement - Documents cannot be uploaded until the NOC is submitted. Upon submission of the NOC the functionality to upload a document will appear in the menu on the left hand side of the page.

4. If you have any questions or concerns relating to notifying Indigenous groups potentially impacted by contamination, please discuss with the environmental specialist assigned to your file.

NOC - Actions

The actions page allows the company to describe the actions taken to date to mitigate the impacts of contamination and planned remedial activities. The actions page will also trigger the system to require additional information based on the user’s input.

Actions

Provide a summary description of the actions taken to date to mitigate the impacts of contamination *

Provide a summary description of the actions that are planned to mitigate the impacts of contamination *

Have all substances in soil, groundwater, and surface water been cleaned up such that they meet the applicable criteria for the current land use? The applicable criteria are the more stringent of federal or provincial criteria *

Is the contamination confined to company-owned property? *

Key Things to Know About the NOC Actions Page

1. The planned remedial activities should include a brief description of planned next steps.
2. If indicated that all substances have been cleaned up such that they meet the applicable criteria, an email will be sent notifying you that a closure report must be uploaded in order to achieve site closure, as outlined in the Remediation Process Guide.
3. Note that company owned property does not apply to Right of Ways unless the company owns the property on which the Right of Way lies. **If the contamination is confined to company owned property at the time of NOC submission but is later determined to have migrated off company owned property, an email must be sent to remediation@neb-one.gc.ca notifying the NEB of the off-site migration.** Similarly, if no free product has appeared in groundwater
monitoring wells at the time of NOC submission, but is later detected in wells, the NEB must be notified.

**NOC - Screening Assessment**

The screening assessment page allows the company to provide additional information about the contamination in the situations where contamination has not been cleaned up at the time of NOC submission and contamination is not confined to company owned property. The responses should reflect the information available at the time of NOC submission.

- **Is the contamination confined to the right-of-way?**
- **Will the site be cleaned up to generic criteria based on land use and soil grain size?**
- **Does the landowner agree to the proposed approach?**
- **Is the contamination greater than 1.5 m below ground surface?**
- **Are the soil laboratory results 10X higher than the most stringent applicable generic criteria?**
- **Does the soil tested have a median grain size greater than 75 μm mean diameter at the impacted site?**
- **Does the contamination affect habitat for Species at Risk?**
- **Is the contamination located within a provincial park, national park, or protected area?**
- **Is the contamination within 500 m of a residence?**
- **Is there additional information that might impact the complexity of the remediation at this contaminated site, e.g. indigenous concerns, unique geology (bedrock)?**

**All Events – Documents Page**

The Documents screen allows for the upload of documents relating to the event including, photographs, reports, various types of correspondence, etc.
Populate the mandatory fields and select document type from the drop down menu.

You can select “Add” for each additional document, or you can click “Next” when all documents have been uploaded.

**Key Things to Know About the Documents Page:**

1. The size limit for uploads is 25 mb. If you have a larger file than that you may submit it in hard-copy or via digital media directly to the NEB Records and Mail department. When you do so please quote the event number for the file.

2. You may upload as many documents as are required.

3. Once you’ve uploaded a document and you wish to delete it, you can contact the NEB using the “Send a Message” function.

4. Do not upload documents that contain private or sensitive information. You must submit any of these documents in hard-copy to the NEB Records and Mail department and indicate that you
wish to submit them under section 16.1 of the NEB Act. As above, please include the event number with the document.

**All Event Types – Final Submission**

OERS is designed to handle one or two step reporting functions. The “Final Submission” is the second step in the two step reporting process for Incidents and Unauthorized Activities. It is also considered the only step for one-step notifications (i.e. those that reside under the “Notifications” section on the “Event Types” page.

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**Key Things to Know About the Final Submission Page**

1. After submitting the “Final Submission” you will receive a “Final Event Report” notification email with the contents of your report.

2. You will lose access to the event file after “Final Submission” is completed (unless you are required to report spill costs or remediation documentation in which case the link remains active).
After Final Submission – Event Review and Close Out

The NEB staff assigned to your file will review the information submitted and may ask information requests via email. They may also restore access to the file for you to input more information or upload documents. If this is the case, they will make this clear in their information request(s).

Once NEB staff are satisfied that the appropriate causes and preventative/corrective actions have been identified, they will close the event. You will receive an “Event Closed” notification email with the contents of the file including “Technical Analysis” where the NEB staff will communicate any pertinent analysis to the company. The following section contains some additional information about the follow up required on NOCs.

NOC - Following Submission

Upon review of the file, the specialist will send an email outlining the next action required for this file. This email will include a link that can be used for future communication (IR responses) and for uploading documents. Based on the information entered, the system may automatically send an email requesting a closure report. Use the link in the email to enter the online portal to upload the report.

Upon re-entering OERS following NOC submission, the menu on the left hand side will include the following Table of Contents.

NOC- Summary

This page provides an overview of the information entered in the NOC.

NOC- Contact

This page allows you to edit your contact information.

NOC - Remediation Reports

This page lists the reports required by the NEB for this REM file, according to the Remediation Process Guide. The “Upload Document” page should be used to upload the required documents by the specified submission date. Upon uploading a document, the NEB's technical specialist will be notified to review and follow up as appropriate.

Selecting the “Reports” under Remediation Reports will allow you to view the specific reports required. Clicking on the specific report will bring you to a page that can be used to edit the submission date of the document with a rationale for the submission date change. Documents can be uploaded by selecting the “Upload” on this page or directly through the “Upload document” page.

This page also contains a requirement to enter the email address to which the reminder to complete the Annual Update should be sent. The default for this field is the contact entered at the time of NOC submission.
**NOC - Information Requests**

The NEB staff assigned to your file may issue an information request to gain further understanding, clarification and information on a report that was uploaded. The system will notify you via email when additional information has been requested. Select “Information Requests” and then “Edit Response” to respond to the information request. All responses to information requests must be entered through the system.

If the response to the information request includes a document, upload the document through the “Upload Document” page and select which Remediation Report Type and IR this response is addressing.

The status of the information requests are located on this page.

**NOC - Annual Updates**

An annual update must be submitted for all REM files for which the NOC was submitted prior to 31 December of the previous year, and are not yet closed. You will be able to submit the annual update upon receiving the annual update request email sent by the NEB. Previous annual updates relating to the event will appear on this page.
Appendix 1 – Scenario-Based Guidance on Preventative and Corrective Actions

The Board is of the opinion that an incident is often the result of multiple causes. These include the most immediate cause(s) that led to the incident (e.g., malfunction/defect that resulted in pinhole leak in a pipe body) cascading to basic cause(s) that are related to deficiencies in a procedure for inspecting the pipe body, or deficiencies in management system processes that define how procedures across the system are developed and implemented. Correspondingly, each of the cause(s) will usually cascade to one or more corrective and/or preventive actions.

The Board expects that for all reported incidents, companies will work to understand the:

- nature and extent of the causes including those causes related to the management system and various programs;
- actions required to correct the causes at the specified locations\(^2\) as well as other similar locations\(^1\) to ensure immediate compliance and protection of people and the environment; and
- actions required to prevent occurrence or reoccurrence of causes at a facility or during an activity or to prevent occurrence of identical causes at similar facilities or similar activities.

The Board expects that companies will use structured and defensible processes for analyzing incidents to identify causes as well as corrective and preventative actions. In the comment box provided under the list of corrective and preventative action endorsements, companies should include

i. the method used to determine causes in order to appropriately develop corrective and preventative actions, and
ii. additional contextual information about the nature of each corrective and preventative action implemented and/or planned for implementation.

The Board recognizes that variation exists in definitions of corrective and preventative actions. The Board uses the following definitions:

Corrective Actions: actions taken to remove or control the cause(s) (most often the immediate cause) in order to eliminate the hazard, or minimize the associated risk (e.g., fix an existing problem).\(^3\)

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\(^2\)The term “location(s)” refers to different locations across a single worksite or across various worksites.

\(^3\)
**Preventative Actions:** actions taken to remove or reduce the likelihood of the occurrence or reoccurrence of the cause(s) in order to anticipate a hazard or minimize the associated risk that could occur (e.g., take steps to address a potential problem). Typically, actions are preventative if they proactively address analogous/comparable causes or potential causes.

Preventative actions can be further broken down into:

Tier I – actions taken to address causes at additional locations\(^1\) where similar/identical situations exist in order to proactively eliminate the identified risk; and

Tier II – actions taken to address systemic causes; typically associated with changes to a company’s management system that impact the entire company or pipeline system.

Figure 1 helps to illustrate how the NEB differentiates between corrective and preventative actions:

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\(^{3}\) Adapted from CSA. (2014). *Occupational health and safety management* (Z1000-14). Toronto, Canada: Canadian Standards Association.
Figure 1. Graphical representation of corrective and preventative actions.

The tables below provides definitions and examples for the corrective and preventative action options available in the Event Reporting System (ERS). The corrective and preventative action options, descriptions, and examples are under continuous improvement. If you have input or questions regarding these options please contact DLERSSupport@neb-one.gc.ca.

Note: When selecting corrective and preventative actions in ERS it is expected that a detailed description is included in the accompanying comment box for all of the endorsed corrective and preventative actions.
<table>
<thead>
<tr>
<th>Action</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Actions Taken</td>
<td>No actions were taken at the site level in response to the incident.</td>
</tr>
<tr>
<td>Update Procedures/Standards/Specifications</td>
<td>A gap in procedures/standards/specifications was identified to have contributed to the incident and change were subsequently made to an existing procedure, standard, or specification and appropriately communicated to pertinent staff. Example: procedure was out of date, not representative of operational practice or missing a pertinent step which contributed to the incident; procedure is revised accordingly.</td>
</tr>
<tr>
<td>Create New Procedure/Standard/Specifications</td>
<td>A gap in procedure/standards/specification was identified to have contributed to the incident and a new procedure, standard, or specification was subsequently developed and implemented (e.g., communicated to appropriate staff / training is provided if necessary). Example: a missing procedure was identified as directly contributing to the incident; a new procedure is developed to appropriately document the steps necessary for the completion of a new work task.</td>
</tr>
<tr>
<td>Worker Specific Action</td>
<td>Worker Specific actions used for one or more individuals in response to the incident.</td>
</tr>
<tr>
<td></td>
<td>Example:</td>
</tr>
<tr>
<td></td>
<td>(Informal) - Supervisors are coached on the importance of inspection activities that i) ensure proper implementation of procedures and ii) ensure the necessary competency to conduct specific activities.</td>
</tr>
<tr>
<td></td>
<td>(Formal) - Company’s discipline process was used.</td>
</tr>
<tr>
<td></td>
<td>Formal – specific goal related to an incident cause identified in the individual performance management i.e. complete incident reporting training</td>
</tr>
</tbody>
</table>

*Please be sure to include the nature of the performance management used in the comment box provided (e.g., if it was field staff, leadership, or both who received the performance management and the type of performance management used).*
<table>
<thead>
<tr>
<th>Competency Assessment, Training and/or Retraining for those staff involved in the incident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assessment of staff competency, training, or re-training are used in response to the incident for those staff directly involved in the incident.</td>
</tr>
<tr>
<td>Example: staff who were involved in the incident had limitations in competency and receive refresher training as a result.</td>
</tr>
<tr>
<td>Please be sure to include the nature of the competency assessment or type of training that was given in the comment box provided.</td>
</tr>
<tr>
<td>Repair/Replacement</td>
</tr>
<tr>
<td>Example: An O-ring is replaced with a new one of the same material.</td>
</tr>
<tr>
<td>Please be sure to include the type of repair (e.g., permanent versus temporary repair) in the comment box provided.</td>
</tr>
<tr>
<td>Upgrade</td>
</tr>
<tr>
<td>Example: An O-ring is replaced with an upgraded version that contains longer life expectancy.</td>
</tr>
<tr>
<td>Modify Schedule/Plan</td>
</tr>
<tr>
<td>Example: a contributing factor to the incident was identified to be insufficient time for communication between staff during shift handover. Consequently, a modification is made to the staff's work plan to require additional time for necessary communications during shift handover.</td>
</tr>
<tr>
<td>Correct Role Responsibilities for those staff involved in the incident</td>
</tr>
<tr>
<td>Example: written clarity regarding who is the leader/decision-maker in a work group is made to staff; responsibility for who communicates what information (and when) to other work groups is corrected (e.g., defined).</td>
</tr>
<tr>
<td><strong>Increase Inspection/Review Frequency for the specific material or practice involved in the incident</strong></td>
</tr>
</tbody>
</table>

*Note: Examples provided are not inclusive of all options that may fall within the respective category.*
Preventative Actions (Tier I)

Actions taken to address causes at additional locations\(^1\) where similar/identical situations exist in order to proactively eliminate the identified risk

*The term “location(s)\(^*\)” used below can mean different locations across a single worksite or across various worksites.

- **Example 1 – different locations across a single worksite**: in addition to correcting the material that contributed to the incident, the same material is inspected and replaced as necessary on numerous structures within the worksite.
- **Example 2 – different locations across various worksites**: In addition to addressing a procedural gap identified to contribute to the incident, the procedure is updated and appropriately communicated to staff at all other worksites where the risk exists.

<table>
<thead>
<tr>
<th>Action</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Actions Taken</td>
<td>No actions were taken in response to the incident</td>
</tr>
<tr>
<td><strong>Local/Regional Staff Communication</strong></td>
<td>At a local/regional level staff were made aware of the incident’s causes and lessons learned. This includes information on what happened, causal and contributing factors, steps taken to address the causal and contributing factors and prevent future occurrence, and important factors for local/regional sites to check and take action on. Example: safety alert issued for all sites in the region where the risk exists.</td>
</tr>
<tr>
<td><strong>Update Procedures/Standards/Specifications at more than one location(^*)</strong></td>
<td>As a result of an incident, a change is made to an existing procedure, standard, or specification at more than one location(^<em>) where the risk exists. Example: procedures were revised to more clearly describe the steps necessary for completion of the work task and implemented (communicated appropriately) to staff at all pertinent company locations(^</em>).</td>
</tr>
<tr>
<td><strong>New Procedure/Standard/Specifications at more than one location(^*)</strong></td>
<td>As a result of an incident, a new procedure, standard, or specification is developed and implemented (communicated / training is provided if necessary) at more than one location(^*) where the risk exists. Example: a new procedure was developed to appropriately document the steps necessary for the completion of a new work task and...</td>
</tr>
<tr>
<td><strong>Competency Assessment, Training and/or Retraining at more than one location</strong>*</td>
<td>Implemented (communicated appropriately) to staff at all pertinent company locations*.</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td><em><em>Assessment of staff competency, training, or re-training are used in response to the incident for pertinent staff at more than one location</em> where the risk exists.</em>*</td>
<td>Example: pertinent staff at all locations* where the risk exists receive refresher training. Please be sure to include the nature of the competency assessment or type of training that was given in the comment box provided.</td>
</tr>
<tr>
<td><strong>Repair/Replacement made at more than one location</strong>*</td>
<td>A repair or replacement of material/materials is completed in response to the incident at more than one location* where the risk exists. Example: after a leak was identified in an above ground storage tank the remaining above ground storage tanks across the site are inspected and, as necessary, repaired. Please be sure to include the type of repair (e.g., permanent versus temporary repair) in the comment box provided.</td>
</tr>
<tr>
<td><strong>Upgrade made at more than one location</strong>*</td>
<td>An upgrade is performed in response to the incident (replacement of material/materials with upgraded material/materials) at more than one location* where the risk exists. Example: after a leak was identified in an above ground storage tank, the remaining above ground storage tanks across the site are inspected and, as necessary, the tanks were replaced with new (upgraded) storage tanks.</td>
</tr>
<tr>
<td><strong>Schedule/Plan Modification for more</strong></td>
<td>A modification is made to a work schedule or work plan at more than one location* where the risk exists.</td>
</tr>
<tr>
<td>Correct Role Responsibilities at more than one location*</td>
<td>Example: for all work groups at the worksite, staff arrival and departure times are adjusted on the work schedule in order to facilitate more time for shift handover.</td>
</tr>
<tr>
<td>---------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><em><em>Correction of roles and responsibilities is made or role responsibilities are clarified for pertinent staff at more than one location</em> where the risk exists.</em>*</td>
<td>Example: clarity of who is the leader/decision-maker in a work group is made to staff at more than one location* where the risk exists; responsibility for who communicates what information (and when) to other work groups is corrected (e.g., defined) at more than one location* where the risk exists.</td>
</tr>
<tr>
<td>Increase Inspection/Review Frequency at more than one location*</td>
<td>A change in the frequency or scope of site-level inspection is made and at more than one location* where the risk exists.</td>
</tr>
<tr>
<td><strong>Example: an inspection type is made to occur bi-weekly instead of once per month</strong></td>
<td></td>
</tr>
<tr>
<td>Action</td>
<td>Examples*</td>
</tr>
<tr>
<td>-------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>No Actions Taken</td>
<td>No actions were taken across the system/company level in response to the incident.</td>
</tr>
<tr>
<td>Staff or Internal Communication made across company/system</td>
<td>Example: safety alert issued across the company (or across the company at those sites where the risk exists).</td>
</tr>
<tr>
<td>setting/achieving goals, objectives and targets</td>
<td>Example: Company develops specific objectives, short term objectives and/or performance measures for senior management to monitor the inspection of all similar facilities to ensure oversight of suspected hazards and risk.</td>
</tr>
<tr>
<td>hazard identification or risk assessment</td>
<td>Example: Company modifies and implements revised Front Line Hazard Assessment Process to include updated information related to specific hazards or controls (e.g. Common Hazard Information).</td>
</tr>
<tr>
<td>control of identified hazards</td>
<td>Example: Company modifies and implements revised Front Line Hazard Assessment Process to include updated information related to specific hazards and risk. E.g. Changes to standard probability or consequence ratings.</td>
</tr>
<tr>
<td>identifying and inventorying legal requirements</td>
<td>Example: Company modifies and implements revised procedures for monitoring changes to legal requirements in order to include technical standards that may have contributed to or prevented incident causation.</td>
</tr>
<tr>
<td>management of change</td>
<td>Example: modification and implementation of management of change procedures to include specific requirements for management of changes applicable to multiple sites necessitated by incident investigations (e.g. Changes necessitated by identification of root cause analysis activities.</td>
</tr>
<tr>
<td>developing competency requirements, training programs, and verification of competency</td>
<td>Example: New or refresher training requirements were identified and provided across operational areas and/or learning management system updated to manage new or modified competency and training requirements. This includes developing competency requirements, training programs and verification of competency for leadership (e.g., supervisory) positions.</td>
</tr>
<tr>
<td>Category</td>
<td>Example</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>inspecting and monitoring the companies activities and facilities</td>
<td>Example: revision of inspection criteria, protocols, and schedules is made for inspection of above ground storage tanks at all sites across the company.</td>
</tr>
<tr>
<td>developing contingency plans for abnormal events</td>
<td>Example: procedures related to who must be contacted in the event of an abnormal operation (e.g., operating design limits have been exceeded due to a pressure, flow rate, or temperature change outside the limits of normal conditions) are revised to include additional parties.</td>
</tr>
<tr>
<td>awareness/communication of key information</td>
<td>Example: Company modifies and implements revised procedures for the documentation and communication of lessons learned from incidents.</td>
</tr>
<tr>
<td>control and management of documentation/records including procedures/practices/standards</td>
<td>Example: Modify document control procedures to ensure that all safety critical standard operating procedures and practices such as confined space entry, tank gauging, field level hazard assessment, pipe stringing, etc. are reviewed and approved on a frequency above minimum standards that reflect the risk evaluation or potential consequence of the activities controlled by each.</td>
</tr>
</tbody>
</table>

*Note: Examples provided are not inclusive of all options that may fall within the listed category.*