



KEYNOTE

Already There

Leveraging Today's Risk Work to Ensure Tomorrow's Compliance

A Transitional Solutions Inc. perspective on risk management, regulation, and resilience

Keep your hand up if...



Your organization already has a hazard assessment, a written emergency response plan, and people who've trained and drilled on it.



You've read Directive 071 cover to cover in the last year.

The gap between those two hands is the whole talk. It isn't a knowledge gap — it's a naming gap.

SECTION 01 · ORIGIN STORY

Where process safety came from

March 23, 2005 — BP's refinery in Texas City. A distillation tower overfilled on startup; relief valves discharged into an old atmospheric blowdown drum instead of a flare stack. It overflowed and found an ignition source.

15

People killed

180

People injured

Not here to relitigate the investigation - you know it. What matters is what it built: modern process safety management.

Performance indicators. Siting standards. Fatigue management. The whole discipline of treating catastrophic risk as something distinct from personal safety... it's all traceable to this one event.

SECTION 01 · ORIGIN STORY

Grown up in separate rooms

While process safety was being forged out of Texas City, emergency management was already a mature discipline.... built on a completely separate track.



1991

Disaster Mgmt
Committee struck

2000

NFPA 1600
becomes a standard

2008

CSA Z1600
becomes a standard



1985

Process safety becomes a
formal regulatory discipline
after Bhopal

1992

OSHA PSM
Standard adopted

2005

Texas City

NFPA's standard was finalized five years before Texas City; before Katrina, even before 9/11. Two communities, two vocabularies, built independently and still largely separate today.

SECTION 02 · STILL IN SILOS

The pieces exist. Do they talk to each other?

PROCESS SAFETY



Hazard & process risk
assessment



Leading & lagging indicators

Usually: engineering / operations

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EMERGENCY MANAGEMENT



Emergency response plan



Incident command & business
continuity

Usually: EHS / security / corporate resilience

Different department. Different budget. Sometimes a different building.

Not a failure.

Just how these two disciplines grew up.

The idea exists. The practice lags.



What the standards call for

NFPA 1600. Directive 071's HICA. Both call for your emergency management program to be risk-informed: built directly off the hazard and consequence work you've already done.



What usually happens

Most ERPs weren't built from the risk assessment. They were built from a template... or from whatever the last audit asked for.

That gap is exactly why there's a scramble every time a new directive lands.

If your ERP were already risk-informed, HICA wouldn't feel like new work. It would feel like paperwork catching up to what you already do.



Show of hands — honestly

Whose emergency response plan was built directly from your hazard and risk assessment? Not a template, or an old plan with the names changed?

Expect fewer hands than the cold open. That's the point — not a gotcha.

Quick regulatory scan

Which of these require a hazard identification & risk assessment — and which of the four pillars of emergency management do they touch?

Regulation	Hazard ID / risk assessment?	Pillars touched
CEPA Environmental Emergency Regulations (E2)	Yes - worst-case scenario	Preparedness, Response
CER Onshore Pipeline Regulations	Yes - EMP required	Prevention, Preparedness, Response
TDG Emergency Response Assistance Plans	Yes - for regulated goods	Preparedness, Response
Alberta OHS Code, Parts 2 & 7	Yes - every employer	Prevention, Preparedness, Response
AER Directive 071 (HICA)	Yes - consequence-based	All four pillars

Mitigation/prevention, preparedness, response, recovery: the four pillars Public Safety Canada uses nationally. Almost nobody names them explicitly. But the structure is always there.

SECTION 03 · REGULATORY LANDSCAPE

The same pattern, right here

Directive 071 is today's live example — not because AER did anything unusual, but because it's the same shape we just saw with Texas City and NFPA.

EXISTING SECTOR STANDARD

CSA Z246.2

Petroleum & gas emergency preparedness -
sector-specific



builds on

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TODAY'S EXAMPLE

Directive 071 · HICA

New forms, new vocabulary - same sector



CSA Z1600 (Canada) & NFPA 1600 (North America)

Already existed. All-hazards, all-sector. Not referenced in Directive 071.

A sound, sector-specific choice: H₂S and emergency planning zones are real, specific hazards. But it's the same pattern as NFPA and process safety: two vocabularies, running parallel.

AUDIENCE INTERACTION



HICA reassessed. Declarations resubmitted every 12 months. Self-assessment at least every 5 years.

Do you already have a plan for that five-year review — on top of the audits, the training, the day job?

Or are you hoping you'll figure it out when the letter arrives?

That feeling is exactly why the rest of this talk is about bridging practices... not another checklist.

How to navigate without duplicating the work



Build one program, not five

Architect your risk & emergency management program once, around the all-hazards CSA Z1600 / NFPA 1600 spine. Every regulatory output — HICA, E2 plans, OPR manuals — flows from that one program.



Check, then cross-check

Check: does our existing program already produce this, under a different name? Cross-check: document the linkage explicitly in a living crosswalk an auditor can follow.



Be disciplined about nomenclature

Keep the vocabulary your people are trained on. When a regulatory term differs, say so explicitly in writing — don't rename your whole program every time a directive gets a new acronym.

SECTION 04 • BRIDGING PRACTICES

A living compliance crosswalk



What you may call it	What the regulator calls it	Verified by
Site HIRA	Directive 071 — HICA	Annual review + management sign-off
Emergency Response Plan	E2 Plan (CEPA) / ERP (D071)	One document, cross-referenced in both filings
ICS-based response program	OPR Emergency Management Program	Training records + consultation log (gap: log incomplete)
Training & drill records	OHS Code Part 7	Signed attendance + exercise after-action report

Every organization's internal names will differ. The point isn't the exact wording; it's that each row closes with something a regulator can actually verify.

AUDIENCE INTERACTION



30 seconds. Turn to your neighbor.

Name one regulation you deal with that you privately think is just a rename of something you already do.

That instinct is usually correct. The discipline is proving it on paper.... not re-doing the work.

TWENTY YEARS IN THIS GAP

Where Transitional Solutions comes in



We build the one program

Architecting a single risk & emergency management spine your whole organization runs on — not five parallel ones.



We run the crosswalk

Mapping what you already do to what each regulator calls it, so audits find documentation, not scrambling.



We walk in beside you

Twenty years sitting exactly in the gap between process safety and emergency management: this is the where we can help.

If Directive 071 — or whatever comes after it — has your team scrambling, come find us. That's the whole reason we exist.



YOU ARE

Already There

Years of hard-earned discipline already sits underneath almost everything a new directive will ask of you. The job isn't rebuilding it. It's building the bridge once, explicitly, in writing, so your time goes to what actually matters: keeping the people near the unit safe.

Thank you