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**Subject:** OPR Review Topic F - Management System and Contractor Management

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My feedback for the OPR Review Topic F – Management System and Contractor Management.

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- Discussion Question F1. Are there industry best practices that could inform management system related requirements in sections 6.1 through 6.6?
  - Management system requirements need not and should not be embedded in legislation and regulations. The regulations should require that management systems follow accepted and recognized management system standards developed by experts in their fields, of which there are many. Specifically for pipelines these include:
  - CSA Z662
    - Clause 3, Safety and loss management system,
    - Annex A Safety and loss management system,
    - Annex M Guidance for system control, monitoring, and protection of hydrocarbon pipeline systems,
    - Annex N Guidelines for pipeline system integrity management programs.
  - API Recommended Practice 1173, Pipeline safety management systems
- Discussion Question F4. Are there any management system provisions in the OPR that require clarification? If yes, please explain the issue, identify the provision, and propose a solution.
  - Yes, the requirements in Section 6.5.1 a) to x) are prescriptive rather than results-based, and yet are not specific enough to be clear to companies how they are to be met. As a result the CER is left to provide their own interpretation of what is required to meet these provisions, which often does not align with company interpretations. The result is CER staff prescribing requirements.
  - CER audit guidance definitions are in some cases very prescriptive, for example what constitutes a process is very detailed as compared to the definition for a procedure. Established processes may exist without necessarily being documented (though I personally agree that documenting processes is a good idea) or meeting all of the detailed requirements in the definition. This definition and other should be reviewed to ensure they are pertinent and necessary to meet objectives. Wherever possible, these should be results-based rather than prescriptive.
- Discussion Question F5 (&F6). What is your feedback on a new potential requirement for companies to establish and maintain an up-to-date list of all the policies, processes and procedures referred to in sections 6.1 through 6.6?
  - This is a good idea/guidance/practice for companies to follow for their management system, but should not be a requirement. Processes, procedures and programs can be referenced/cross-referenced in various places in the management system without requiring that a master list be maintained.

- Discussion Question F9. “Quality assurance program” is used in two contexts in the current OPR, once in relation to the quality assurance program that must be implemented to evaluate the adequacy of the management system in its entirety and specifically for the programs identified in section 55 [see section 6.5(1)(w)] and again in section 15 whereby the company must develop a quality assurance program for the purpose of ensuring that the pipe and components to be used in the pipeline meet the specifications discussed in section 14 of the OPR. Do you find this confusing? If so, what solution would you propose?
  - The term “quality assurance” is traditionally understood to mean assurance of the quality of materials, e.g. pipelines, valves, welds etc. The assurance of the management system, including required programs could be referred to as “management system assurance” or “operations assurance”. API 1173 uses the term “safety assurance” to refer to “Demonstration of the proper application of the PSMS and progress toward effective risk management and improved pipeline safety performance.”, which is essentially referring to management system assurance, but could be construed by some as referring to personal health and safety rather than overall pipeline safety.

Regards,

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