**What is RP1174 all about?**

The RP establishes a framework for an Emergency Management System (EMS) that includes:

* Statements of the system’s policies and objectives;
* Documented procedures;
* Documents, records, and job aids;
* Identification of legal and other applicable emergency response requirements;
* Processes intended to ensure continuity and promote system improvement; and
* Measure goals and objectives.

**How will it affect us?**

* For those with robust emergency response program, you probably have a lot of this in place already, especially documentation of our ER procedures, related documents, and the legal requirements we must uphold. The change for many of us will be in applying a management system approach to our programs where we go beyond just planning and doing. The approach of having program elements in place to assess our ER risks, measure and check our program performance, and then adjust the program in order to continuously improve will help us be more prepared and have better responses in the future.

**Is this RP and its requirements as big of an effort as RP 1173 – Safety Management Systems?**

* No. Each Operator has the flexibility to implement the various elements of the RP that are relevant and appropriate to their system based on their own operations.
* RP1174 (ER) compliments RP 1173 (SMS). If you are in the process of implementing RP1174, you will be satisfying the requirements for the Emergency Response Element for your implementation of RP 1173 (SMS).
* The adoption, implementation, and training tools for RP1174 were modeled after those used for RP 1173 (SMS) including a Commitment Letter, Gap Assessment Tool, workshops, and adoption and implementation metrics.

**What does it mean if I sign the “commitment” letter?**

* Commitment means that you will pursue implementation of RP 1174 as relevant to your pipeline operation and that you will communicate your baseline and continued progress of adoption efforts to API/AOPL through the percentage of “shall” statements that you have implemented in your ER program (this is automatically calculated in the gap assessment tool).
* API and AOPL is asking that by mid-year 2018, companies who have signed the commitment letter report their baseline of conformance to RP 1174 (the starting point before they start to change their programs to close any gaps.
* This does not mean you will report out your individual program gaps with respect to RP 1174 nor does it mean that you will need to report any gap closure plans or your completed gap assessment tool. Rather, you will report out your progress (percentage as calculated in the tool) in adopting and implementing relative to the confidential gap closure plans you have established relevant to your operations.
* All data will be blinded and compiled to be reported as an average conformance metric, to accompany RP 1173 newsletters; no company-specific conformance metrics will be reported.

**What does “conformance” with RP 1174 mean?**

* Full conformance with the RP means that at a minimum, you satisfy all the “SHALL” requirements listed (92 of 207).
* Because RP 1174 is not a regulation, we urge operators to stay away from the term “compliance” and instead use the term “conformance” when discussing progress being made toward implementation.