

Contractor Health & Safety Program



Howe Sound Pulp and Paper Contractor Health and Safety Program

Version 1.0

June 29, 2020

Contractor Health & Safety Program

GENERAL RULES AND REGULATIONS FOR CONTRACTOR INDOCTRINATION

The following is covered in the attached Contractor Orientation Manual:

1. All contractors must provide Howe Sound Pulp and Paper with a current WCB clearance certificate and updated every 60 days where applicable.
2. All contractors must provide Howe Sound Pulp and Paper with a current copy of their Liability Insurance of at least \$2,000,000.
3. Speed Limit on Howe Sound Pulp and Paper's main road is 30 km/hr and 10km/h inside the mill yard and parking lots.
4. Local emergencies – dial 2222 from an inside line or 604-884-2222 from an outside line.
5. Howe Sound Pulp and Paper Health and Safety Policy
6. Contractor Responsibilities
7. WHMIS training has been received by contractor employees prior to commencing work
8. Howe Sound Pulp and Paper SDS are available through MSDS Online at the Gatehouse.
9. Smoking is only permitted in the designated smoking areas
10. Alcohol or drugs are strictly prohibited on Howe Sound Pulp and Paper property
11. Housekeeping is part of your work: "clean up daily"
12. Howe Sound Pulp and Paper fall protection procedure
13. No contractor will touch any of Howe Sound Pulp and Paper's mobile equipment unless proper training has been verified and the contractor's contact person grants permission.
14. Never block doorways, eyewash stations and fire extinguishers.
15. Lock out procedure to be followed without deviation
16. Confined space procedure to be followed without deviation
17. All equipment operators must have verification of proper training on equipment they will use
18. Hot work procedure to be followed without deviation
19. Contractor to give copies of any SDS of controlled hazardous products brought on Howe Sound Pulp and Paper property (to contact person)
20. Howe Sound Pulp and Paper PPE policy to be followed without deviation
21. Contractors are responsible to provide and train their employees with personal gas monitors for required locations
22. Report any incident/accident to your specific contact person in writing
23. If in doubt about any procedure or rules notify your contact person
24. Barrier tape rules to be followed without deviation

Contractor Health & Safety Program

Table of Contents

Topic	Page
General Rules and Regulations Check sheet	2
Howe Sound Pulp and Paper Health and Safety Policy	4
Section 1 - Overview	
1.1 Program Overview and Elements	5
Section 2 – Contractor Health & Safety Program Administration	
2.1 General Information	7
2.2 Health & Safety Program Administration	7
2.3 Reservation of Rights	9
Section 3 – HSPG General Rules	
3.1 <i>Guardrails/Ladders and Scaffolding</i>	10
3.2 <i>Fall Protection Equipment</i>	10
3.2.1 <i>Fixed Supports (Certified)</i>	11
3.2.2 <i>Temporary Supports (Non-Certified)</i>	12
3.2.3 <i>Fall Protection Plan</i>	12
3.2.4 <i>Rescue/Emergency Plans</i>	12
3.3 <i>Barriers and Barrier Tape</i>	13
3.4 <i>Guarding of Machinery</i>	15
3.5 <i>Lock-Out</i>	16
3.6 <i>Fire Prevention and Protection Procedures</i>	16
3.7 <i>Hot Work</i>	17
3.8 <i>Welding, Cutting and Burning Operations</i>	17
3.9 <i>Chemical Management and TDG</i>	18
3.10 <i>Housekeeping</i>	18
3.11 <i>Mobile Equipment and Certifications</i>	19
3.12 <i>Personal Protective Equipment (PPE)</i>	19
3.13 <i>Pedestrian Safety</i>	20
3.14 <i>Drugs and Alcohol in the workplace</i>	20
3.15 <i>Smoking on company property</i>	20
3.16 <i>Conveyor safety operation and protection</i>	21
3.17 <i>WHMIS</i>	22
3.18 <i>Confined Space Entry (CSE)</i>	26
3.19 <i>Electrical Safety</i>	26
3.20 <i>Electrical Equipment Areas & Access</i>	26
3.21 <i>Embedded Services Locate Request (ESLR)</i>	26
Section 4 – Emergency Response	
4.1 <i>Emergency Response Plan Location</i>	27
4.2 <i>Accidents/Incidents and Critical Injuries</i>	27
4.3 <i>Fire and Evacuation</i>	27
4.4 <i>Environmental Spills</i>	28
4.5 <i>Waste Management</i>	29
Section 5 – Administrative Appendices	
5.1 <i>Contractor Commitment Agreement</i>	30
5.2 <i>Contractor Employee Orientation</i>	31

Contractor Health & Safety Program

HOWE SOUND PULP AND PAPER HEALTH & SAFETY POLICY

SAFETY VISION

Our vision is to have an injury free workplace

SAFETY VALUES

1. Health & Safety is everyone's responsibility
2. We strive to prevent every workplace injury
3. Health & Safety can be managed
4. Nothing we do is worth getting hurt for

HEALTH AND SAFETY POLICY

Howe Sound Pulp and Paper is committed to maintaining a safe working environment. This includes complying with health and safety legislation, maintaining our equipment and premises in a safe condition and ensuring that all employees comply with our established safety practices and procedures. This policy will also become part of any contractual agreements with outside contractors and service providers.

The Company and its Management are committed to:

1. Taking every reasonable precaution to prevent personal injury and to provide and maintain a safe and healthy working environment.

Health and safety is an important part of what we do at HSPP. We will make every effort to ensure that health and safety is maintained and improved.

2. Exceeding and/or meeting relevant legislative requirements.

In addition to relevant provincial legislation and regulations, we will adopt industry standards, codes of practice and guidelines applicable to our industry. Every member of our organization is expected to comply with these standards.

3. Establishing standards and responsibilities for every member of our organization and holding them accountable for their performance in these areas.

Every member of our organization is responsible for maintaining a safe work environment by following established safe work procedures, participating in regular safety training and reporting. Managers and Supervisors are accountable for reinforcing expectations around health and safety within their departments, including: providing training and coaching on safe work practices; confronting and correcting unsafe behaviors, including the use of progressive discipline, where appropriate; and promoting health and safety amongst workers under their supervision.

4. Ensuring the cooperation of employees in carrying out this policy.

The Company is committed to helping each member of our organization contribute to a safe workplace by providing:

- ✓ Regular, on-going training and feedback related to health and safety;
- ✓ Monitoring on-going updates on the status and effectiveness of our safety program;
- ✓ Advisory bodies such as the Joint Health and Safety Committee to promote safety and address workplace concerns;
- ✓ Procedures to establish individual responsibilities for safety and safe work practices to control and eliminate workplace hazards.

Contractor Health & Safety Program

All members of the organization are expected to accept the responsibilities and accountabilities reflected in these Health & Safety Policies.

Section 1 - Overview

1.1 - HOWE SOUND PULP AND PAPER'S HEALTH AND SAFETY PROGRAM

Purpose and Scope of HSPP's Contractor Health and Safety Manual

Howe Sound Pulp & Paper (HSPP) is committed to the health and safety of all of our people, and expects the same commitment by each Contractor to its own people.

HSPP has developed this manual for use by all Contractor companies who perform work or provide services on HSPP premises. Third parties include all on-site service providers, construction contractors, outside carriers and all subcontractors.

This manual is intended to supplement HSPP's existing Health and Safety Safe Work Practices documentation and is by no means meant to be inclusive of the requirements of the Provincial Occupational Health and Safety Act or any other applicable regulations.

General Information

Throughout this manual, reference to a "Contractor" means that company of a contractor and the companies of their subcontractors, consultants, vendors, suppliers and carriers. Any reference to "Contractor management" means people responsible for managing, supervising, or directing contract activities and employees. Reference to an employee or Contractor employee means the contractor's employees and employees of the subcontractors, consultants, vendors and suppliers.

Non-compliance with health and safety requirements is treated the same as non-compliance with any contract provision and may result in work interruptions, work stoppages, or employee removal from the premises. Willful or repeated non-compliance may result in Contractor dismissal and contract termination.

The Contractor Health and Safety Program has 4 elements. These elements include:

Contractor Health and Safety Program Elements

1. Contractor Pre-Qualification

All new contractors must complete the HSPP Contractor Pre-Qualification form and provide all information and documentation as outlined on the form.

Prior to doing work at HSPP, all Contractors must provide:

- ✓ A "Certificate of Clearance" from the WCB
- ✓ Proof of Liability Insurance of at least \$2,000,000.

Contractor Health & Safety Program

2. Requirements of Contractors

This element of HSPP's program is a compilation of the specific information that the Contractor needs to know before and be aware of during the performance of work at HSPP in order to ensure compliance with our program.

Not all information in this section applies to contractors. It is up to individual contractors to review this element and understand the applicable sections based on the work or service that they will be providing to HSPP.

3. Commitment and Registration

This element of the Contractor H&S program includes 2 copies of the HSPP Contractors Health and Safety Program Commitment Agreement." This Commitment Agreement is to be signed and dated (after reviewing the "Requirements by Contractors") by a representative of the Contractor Company who has the authority to commit the Contractor Company to comply with the HSPP Contractor Health & Safety Program. One copy of the agreement is to be returned to HSPP's contact person, the other is to be retained by the Contractor.

4. Contractor Employee Orientation

In this program element, the Contractor is responsible to review the contractor orientation with each contractor employee working at HSPP on an annual basis.

These manuals are to be carried or available to your employees and used as a reference. After reviewing the manual, the contractor employee will complete and sign the acknowledgement section of the handbook. The Contractor must forward copies of the individual acknowledgement forms for each employee that will be working on HSPP premises prior to starting work.

Contractor employees will not be allowed to work at HSPP unless they have had the provided handbook reviewed with them within the last year and have returned the individual acknowledgement forms. The review of the handbook is the responsibility of the Contractor and must be done by competent persons.

Further to the handbook review all contractors and contractor employees must complete the online contractor orientation.

Contractor Health & Safety Program

Section 2 – Contractor Health & Safety Program Administration

2.1 - General Information

Purpose & Overview This element of HSPP’s Contractor Health and Safety Program outlines the specific information that the Contractor needs to know before and be aware of during the performance of work at HSPP’s facilities in order to ensure compliance with our program.

It is a clear expectation that all Contractors must:

- ✓ Comply with all current Federal and Provincial Health and Safety and Environmental legislation; and
- ✓ Provide competent employees and supervision that are knowledgeable and considered experts at the work they are performing.

If at any time while working at HSPP a contractor employee is unsure if the work they are doing is safe, they must stop what they are doing and contact their supervisor immediately.

In addition to these expectations, HSPP has specific requirements of Contractors working at our facilities that must be adhered to.

This section of the manual outlines these requirements. As you review these requirements, it is imperative to keep in mind that the next section of the manual will require you to formally acknowledge that you are prepared to commit your company to adhere to these requirements when performing work or providing services at HSPP.

2.2 - Health & Safety Program Administration

The effectiveness of any Health and Safety Program depends upon the participation and cooperation of Contractor employees and the coordination of their efforts in carrying out the following basic responsibilities:

- ✓ Planning work to avoid injury, property damage, environmental risk, and the loss of production;
- ✓ Establishing and maintaining a system for early detection and correction of unsafe practices and conditions;
- ✓ Providing adequate protection of public and private properties and the environment and ensuring the safety of the public;
- ✓ Establishing and conducting health and safety education programs designed to stimulate and maintain the interest and participation of employees through the use of:
 - Safety meetings and communication;
 - Proper work procedures, personal protective equipment and

Contractor Health & Safety Program

mechanical guards;

- Health and safety instructions for individual employees and group training programs;
- Accident, illness and near miss safety incident investigations to determine causes and corrective actions;
- Records of accidents and loss and accident/loss experience summaries;
- Proper waste disposal procedures.
- ✓ Developing an emergency action plan for the work.
- ✓ Contractors are responsible for establishing and implementing a health and safety program for their employees. This program should include maintaining and auditing safety performance for compliance with applicable provincial regulations and with established health and safety requirements, including, but not limited to, the Contractor's health and safety programs.
- ✓ Contractor and contractor employees are to conduct prejob Task Hazard Analysis before conducting any work in order to identify hazards and control measures.
- ✓ Contractors are to conduct regularly scheduled inspections. The scope or duration of work may regulate the frequency of these inspections.
- ✓ Contractors must take immediate corrective action when a violation of job safety, health, fire, or environmental hazard is observed.
- ✓ Contractors are to regularly review their safety performance. Failure to correct a problem may result in work stoppage in the related area, and work will not be permitted to resume until the problem is corrected.
- ✓ If a Contractor fails to correct the problem, HSPP will take corrective action, and the cost will be the responsibility of the Contractor.
- ✓ Under the terms and conditions of the contract documents, Contractors are required to administer their own health and safety activities and are responsible for the health and safety of their employees. As requested by HSPP, Contractors must submit a written copy or description of their company's health and safety program.
- ✓ The Contractor's health and safety program must meet federal, provincial and local regulatory requirements and be equivalent to or more stringent than HSPP's program. Where the programs are in conflict or the Contractor's program does not address an issue, the HSPP Health and Safety Program as defined in this manual will govern.

Contractor Health & Safety Program

2.3 - Reservation of Rights

During the performance of the work, the Contractor, Contractor employees, sub-contractors, agents and invitees shall strictly comply with all health and safety, environmental, security and other applicable rules and regulations.

In the event any of them violate any such rules and/or regulations, the Contractor employer shall take appropriate action and shall have a disciplinary policy in place that includes for permanent removal from the work site.

HSPP reserves the sole right to determine if such act, or failure to act, constitutes a violation or deviation of any of the rules and regulations. HSPP has the unilateral right to stop work whenever health, safety or environmental violations are observed which could jeopardize the well being of personnel, property or the environment. The expense of such work stoppage and resultant standby time shall be for the Contractor's account.

The failure or refusal of the Contractor employer to correct the observed violation may result in the termination of the contract, and/or the dismissal from the work site of those responsible for such failure or refusal.

In any event, the Contractor employer understands and agrees that any violation of applicable health, safety or environmental rules shall be sufficient cause for termination of Contractor's service by HSPP pursuant to the terms and conditions of the contract.

Contractor Health & Safety Program

Section 3 – HSPP General Rules

3.1 – Guardrails/Ladders and Scaffolding

Guardrails/Ladders and Scaffolding must be provided, installed, maintained and inspected as per WorkSafe BC legislation

3.2 – Fall Protection Equipment

In situations where the hazard cannot be removed or engineering out or where access to the work poses a falling hazard from a height, then a fall protection system must be used. This is a full body harness, with the shortest lanyard (hook up) possible, affixed to a solid support, either a permanent or temporary anchor point meeting legislative requirements. HSPP's standard requires a fall protection system be in place when work is being done from which a fall of 3 meters (10 ft.) or more, or where a potential fall from a lesser height involves an unusual risk of injury. Where applicable, fall protection equipment must have Canadian Standards Association (CSA) approval.

Lanyards used at HSPP are to be equipped with shock absorbers or be of the self-retracting (SRL) type. The use of waist belts is NOT permitted at HSPP. In very few cases, a Professional Engineer has designed a fall protection system that does not include a shock absorber to protect employees where there is a restricted vertical fall clearance zone (area below the employee free of obstacles, platforms, etc.) below the employee. Contractor employees working in such areas, or with such systems, will be notified by HSPP.

Harnesses and lanyard / shock absorbers are used in combination with the following fall protection systems:

- ✓ Travel restraint,
- ✓ Fall restricting
- ✓ Fall arrest, and
- ✓ Vertical and horizontal lifelines.

A Travel Restraint System is an assembly of components capable of restricting an individual's movement on a work surface and to prevent the person from reaching a location from which he or she could fall. A travel restraint system consists of a full body harness, lanyard or self-retracting lanyard (short enough to keep a person away from the fall hazard), and proper anchorage or tie-off point.

A Fall Restricting System is an assembly of components designed to quickly arrest a fall; limiting the freefall to within two (2) feet. A fall restricting system consists of a full body harness, self retracting lifeline or lanyard/shock absorber and an approved anchor or tie-off point.

Contractor Health & Safety Program

A Fall Arrest System is an assembly of components designed to arrest a fall; limiting the freefall to five (5) feet. A fall arresting system consists of a full body harness, self-retracting lifeline or lanyard/shock absorber and an approved anchor or tie-off point.

For permanent and temporary horizontal (travel restraint, fall restricting or fall arrest) lifeline systems, it must be designed by a Professional Engineer and a complete and current copy of the design must be kept on site for as long as the system is in use.

A Vertical Lifeline System is an assembly of components designed to arrest a fall; limiting the freefall to four or six (4 to 6) feet, typically used when performing work over a range in height. This unique system consists of a full body harness, a length of 5/8" diameter rope (other than straight polypropylene, e.g. can be a polyester/polypropylene blend), rope grab complete with a two or three (2 or 3) foot shock-absorbing lanyard (dependent on characteristics of rope grab) and an approved anchor or tie-off point capable of withstanding a 5,000 lb. static load. As per HSPP Standards, all vertical lifeline systems must be designed by a Professional Engineer unless all of the components of the system are pre-engineering and the anchorage support meets sections the legislative requirements. Contractor employees are required to have protection in place where ropes are draped over the edge of buildings, beams, etc. This typically occurs during use of suspended access equipment (elevating work platforms, suspended platforms, 'spiders', bosun's chairs, etc.)

Note: The total fall distance comprises the following: freefall distance, deceleration distance, harness stretch / Dorsal D-ring slide, elongation of any system components, and a minimum three (3) foot clearance to any obstruction, rooftop, lower level, platform, etc. Refer to current legislation and standards for more details.

Only trained personnel shall use and inspect fall protection equipment. Training includes verbal and written instructions delivered by a competent trainer. The trainer shall maintain instruction records for each person including the person's name, dates on which training took place, and the name of the trainer.

3.2.1 – Fixed Supports (Certified)

A permanent anchor point is used as a fixed support in a travel restraint system, fall restricting system, or fall arrest system, if the following conditions are met:

- ✓ The anchor point is installed according to the CSA standard, and;
- ✓ It is safe and practical to use the anchor point as a fixed support.

These anchor points are welded or bolted to major structural components (i.e. beams, columns, etc). Anchor points are NOT to be used for lifting.

Standard HSPP lifting lugs must NOT be used for fall protection anchor points unless they have been specifically designed for this

Contractor Health & Safety Program

purpose and are NOT used for lifting.

Permanent anchor points are typically identified with a sign or tag to ensure that they are only used for fall protection. The sign shall have a white background with black print and shall state:

- ✓ Anchor Point for Fall Protection Only
- ✓ Only One Person per Anchor Point

Anchor points should be at or above the Dorsal D-ring of the employee. Alternatively, the anchor point can be lower if it is a set distance from any unprotected edge.

Inappropriate anchor points include electrical conduits, pipe vents, handrails / guardrails, trusses, ladders, cable trays, scaffolds (unless designed for fall protection), etc.

3.2.2 – Temporary Supports (Non-Certified)

If a fixed support is not available (e.g. an emergency repair) then a temporary fixed support can be used, provided that it meets the minimum “static forces” for the following anchorage support systems:

- ✓ Fall Arrest – 5000 lbs. (22.2 kN)
- ✓ Fall Restricting – 5000 lbs. (22.2 kN)
- ✓ Travel Restraint – 900 lbs. (4.0 kN)

If there is ever any question of a potential fall while using a fall restraint system, the requirements of the fall arrest anchorage shall be used (i.e., 5000 lbs. or 22.2 kN: the weight of a pick-up truck)

3.2.3 – Fall Protection Plan

A Fall Protection Plan must be completed if:

- ✓ Work is to be done at a height where a fall potential of over 7.5m (25 ft) exists, where permanent guardrails are not protecting the worker(s): (staging handrails are to be considered ‘permanent’).
- ✓ When a safety monitor and control zone is being utilized
- ✓ Whenever an unusual risk of injury due to a fall exists from any height.

Completed Fall Protection Plans, or copies, are to be given to the HSSP contact person.

3.2.4 – Rescue/Emergency Procedures

- ✓ To initiate the rescue of anyone in trouble at height at HSPP, contact the mill Gatehouse via phone local 222 or 224, or directly by radio to the Gatehouse via mill frequency #1.
- ✓ The Howe Sound Fire/Rescue Department is available at all times to perform rescue procedures of those at height, as required

Contractor Health & Safety Program

3.3 - Barriers and Barrier Tape

Background

Barriers are used to stop the passage of people, material handling equipment or vehicles in a restricted area.

A barrier must be installed to warn people of hazards created by construction and/or maintenance activities in the area and to direct persons past such hazards.

All barriers at HSPP must be installed in accordance with the applicable provincial legislation

All openings, sumps, vessels bins, hoppers, elevated platforms or pits, which constitute a hazard shall be fenced or otherwise guarded.

Types of Barriers Approved for Use at HSPP

There are two (2) types of Barriers approved for use at HSPP.

1. Fixed Barricades

Fixed barricades are used to physically prevent entry into a restricted area because a hazard exists. Access may be restricted using:

- ✓ Wooden barricades
- ✓ Concrete barricades
- ✓ Fabricated structures made of wood or steel
- ✓ Fencing

Fixed barriers should be used to prevent the entry of unauthorized people or equipment into areas where a hazard exists. Examples of situations where a fixed barricade should be used include:

- ✓ Openings in the floor, walls, platforms and handrails;
- ✓ Trip hazards, such as uneven floors or surfaces under repair;
- ✓ Fall prevention.

2. Barrier Tape

Mill approved barricade tape is acceptable to cordon off an area for the purposes of informing employees that a hazard exists. Barricade tape is NOT to be used for temporary handrails, as a restraining device, to cordon off potential fall hazards, or for any other use where a physical barrier is required. It does not meet the requirements for this purpose.

When using barricade tape or barricades, they must be prominently displayed on all sides and approaches and maintained in this manner for the duration of the job. In critical situations it may be necessary to use signs, strobe lights or a watchman in conjunction with the barrier.

Contractor Health & Safety Program

A mill approved identification tag must be used to indicate Date, Hazard, and Name & Signature of the person who has applied the tape.

Tags are available from mill stores – MSS# 1823-4055

Tags should be spaced no more than 30 feet apart and on all sides and all approaches to the job.

BARRICADE TAG
DATE:
HAZARD:
NAME (Print):
NAME (Signature):

It is also a requirement that any employee installing barricade tape or permanent barricades in an operations area in the mill, must notify the area operator. The operator must then note the situation in the daily log so that other crews are notified.

TYPES OF BARRICADE TAPE

The two types of approved barricade tape are as follows:

“DANGER - DO NOT ENTER” barricade tape must be re-pulpable, red with black lettering. This tape is to be used when it would be hazardous to employees entering the area, or to employees working below the cordoned off area. This tape is available from mill stores - MSS# 1823-4050

NO ONE IS TO ENTER THE AREA UNLESS DIRECTLY INVOLVED IN THE SAFE REPAIR OF THE HAZARD OR IF APPROVED BY THOSE DOING THE WORK.

“CAUTION” barricade tape must be re-pulpable, yellow with black lettering. This tape is to be used when it is deemed appropriate to enter the area using caution and wearing or using the required Personal Protective Equipment (P.P.E.).

THE USE OF ANY OTHER BARRICADE TAPE TO CORDON OFF AN AREA IS STRICTLY FORBIDDEN.

Contractor Health & Safety Program

The use of approved stanchions and chains may be used where required, provided appropriate tags and/or signage are applied.

- Rope is permitted to be used to prevent a hazard while the correct, approved barrier tape and tags are being retrieved.

All barrier tape must be removed from the site at the time the work is complete or at the time the hazard no longer exists.

3.4 – Guarding of Machinery

Machines must be guarded to prevent people from contacting hazards.

- ✓ A guard is a physical barrier that prevents access to a danger zone
- ✓ A danger zone is the area around a machine (front, back, sides, top and bottom) where a hazard is created by the motion of the machine components

A guard is required on equipment when there is a risk of inadvertently contacting a hazard. A person may inadvertently contact the hazard while walking by, performing maintenance in the area, leaning on the equipment, or by reaching over or under it.

Before using a piece of equipment, it shall be checked to ensure that the guards are in place, and in good condition, and functioning properly. If there is a problem or defect, it must be reported immediately.

Equipment or machinery shall not be used until the problem is corrected. Employees are not to use the machinery until the problem is corrected. Guards or safety devices must not be by-passed by any means to defeat the purpose of that guard.

Guards may be removed by authorized personnel, for repair or general maintenance. In this case, the machine must be locked out to prevent inadvertent activation and exposure to machine or equipment hazards. Guards must be replaced correctly when the work is complete.

Contractor Health & Safety Program

3.5 - Lock-Out

Lock Out

Please refer to the Lockout Program

3.6 – Fire Prevention and Protection Procedures

Contractors, sub-contractors and agents shall ensure that temporary fire protection measures such as the installation of fire extinguishers or temporary fire hose lines have been provided near hazardous locations.

- ✓ Access to all fire protection equipment must be maintained at all times.
- ✓ Hot Work Permit procedure must be followed
- ✓ Fire extinguishers are required:
 - In the immediate area of any burning, welding, arc cutting operation
 - In the immediate area of any flammable liquid storage area
 - Within 5 feet (1.5 meters) of any location where gas powered equipment is being used.
- ✓ If a HSPP fire extinguisher is discharged or found to be in need of repair, contact the HSPP Contact person for a replacement.
- ✓ Good housekeeping is to be maintained at all times. Clean up the work area as necessary to ensure that debris does not accumulate.

Contractor Health & Safety Program

3.7 – Hot Work

Hot Work Procedure

Please refer to the Hot Work Procedure

3.8 – Welding, Cutting and Burning Operations

Contractor employees will be expected to comply with these requirements:

- ✓ Hot Work Permit has been completed, reviewed and followed
- ✓ Ensure that fire protection systems (e.g. sprinklers) are in service before beginning work.
- ✓ Welding and burning (cutting) equipment must be in good condition (e.g. no gas leaks)
- ✓ When welding or burning, all employees in the area must be aware of the work being done and the existing procedures.
- ✓ Keep the area clean of any grease, oil or combustibles. Combustibles that cannot be moved shall be protected with fire-resistant blankets/tarpaulins or metal shields.
- ✓ Contractor personnel must not operate any welding equipment unless they have been properly trained in the safe operation and inspection of the equipment.
- ✓ Welding cable shall be used and stored so that a tripping hazard does not exist.
- ✓ Fuelled welding machines shall be positioned outside buildings and properly grounded. When refueling, ensure that the machine engines are shut down.
- ✓ Routine daily inspections should be made of all welding equipment and components. This should include the machine, electrical cables, plugs and electrode holders. Any defects should be repaired or the defective equipment replaced immediately.
- ✓ Welding plug splitters should not be used at HSPP if the cable used is not of sufficient size to carry the current indicated on the plug connectors, or would be used by two welding machines. If there are no screw-on covers for the connector ends this could result in exposure to live 480 volts on an unused connector plug.

Contractor Health & Safety Program

3.9 - Chemical Management and Transportation of Dangerous Goods (TDG)

The Contractor shall comply with all applicable TDG laws and regulations.

Unless otherwise specified in writing by the Contractor(s) and HSPP, the Contractor will:

1. Have a written list or inventory of all chemicals being brought by the Contractor to the job site, with up-to-date Material Safety Data Sheets (MSDS). The chemical inventory should contain:
 - ✓ The name of the material;
 - ✓ The amount used and stored (e.g. per year, month or whatever is convenient); and
 - ✓ Where the material is used and stored.
2. Have an up-to-date written emergency response plan which outlines action steps to be taken by the contracting employees in the event of a leak, spill, fire or explosion. Contracting employees must have been properly trained in spill response and control procedures and if expected to respond to a “dangerous goods occurrence”, received TDG training once every 3 years.
3. Ensure that chemical containers (drums, totes, etc.) are labeled as to content and in good condition and impermeable to the chemicals they contain. Non-compatible chemicals must be segregated. All applicable safety marks, labeling, placarding and documentation must be used.
4. Ensure that valves and nozzles are locked in the closed position when not engaged.
5. Have all required licenses to purchase, store or use a chemical and comply with all chemical storage and chemical waste regulations.

3.10 – Housekeeping

Housekeeping is extremely important at HSPP.

All Contractor personnel must maintain a clean and orderly workspace.

- ✓ All access walkways, roadways and emergency access routes must remain free from obstructions at all times.
- ✓ Rubbish, trash, and other debris must be removed from the work area on a daily basis or more often, if required.
- ✓ Scrap materials and demolition rubbish must be removed as soon as possible.
- ✓ All equipment which is removed and to be replaced by new equipment must be removed as soon as possible.
- ✓ Trash containers must be placed in appropriate locations.
- ✓ At locations where drinking water is dispensed, an adequate trash

Contractor Health & Safety Program

container must be provided for the disposal of used drinking cups.

- ✓ All extension cords, light stringers, and welding cables must not create a tripping hazard.
- ✓ Welding rods, nuts, bolts, and washers must be kept in proper containers.
- ✓ All equipment not stored in the work area must be removed and properly stored.
- ✓ Any spills must be isolated and cleaned up and reported immediately.

3.11 - Mobile Equipment and Certifications

Background

This section discusses the requirements related to Mobile Equipment that may be required to perform the work Contracted by HSPP.

All Contractors must ensure that all personnel required to operate mobile equipment such as forklifts, zoom booms, scissor lifts, etc. during the course of their work are properly trained, possess a current and necessary license/certificate indicating the completion of the appropriate operator training and are competent.

All mobile equipment brought onto HSPP premises must be in good operating condition, with current maintenance and inspection records available upon request.

Forklifts, Scissor Lifts and Elevated Work Platforms

- ✓ All Contractor personnel operating forklifts, scissor Lifts, zoom booms or any other types of elevated work platforms must possess a valid operator's license and be able to demonstrate operator competence.
- ✓ All Contractor personnel are required to wear a 5-point harness that is secured to a fixed point at all times while working on an elevated work platform.

3.12 - Personal Protective Equipment (PPE)

PPE

Please refer to Appendix "C"-Personal protective equipment policy. During maintenance shutdowns, full gate-to-gate PPE is mandatory including safety boots, hi-vis vest, safety glasses and escape respirator.

Respiratory Protection

Please refer to the Respiratory Protection Program

Personal Gas Monitors

Contractors are responsible to provide and train their employees on personal gas monitors when required.

Contractor Health & Safety Program

3.13 – Pedestrian Safety

In any work environment, it is important for pedestrians to be aware of their surroundings.

The following guidelines must be observed by all pedestrians while walking in the warehouse:

- ✓ Be aware of mobile equipment.
 - Yield the right away to mobile equipment. Pedestrians must be aware of the braking distance required to bring material handling equipment to a complete stop.
 - When approaching a piece of material handling equipment:
 - 1) move to the nearest side of the aisle way;
 - 2) establish eye contact with the operator; and
 - 3) wait for the operator to bring the machine to a complete stop and wave you by before passing the mobile equipment.

3.14 – Drugs and Alcohol in the workplace

Working under the influence or having in your possession alcohol, cannabis or illegal drugs is strictly prohibited.

Employees taking medication which may affect their ability to work safely are responsible to know the probable effects of their medication.

3.15 – Smoking on company property

Smoking on site is restricted to the designated smoking areas only see your contact person for more details.

Smoking in all other areas of the mill is strictly prohibited.

Contractor Health & Safety Program

3.16 – Conveyor safety operation and protection

Operation

Conveyors play an important role in our daily operations. However, as with any equipment, there are hazards associated with conveyors that require awareness and safety.

- ✓ Hands being trapped in or crushed by the rollers;
- ✓ Jewelry, loose clothing or hair becoming entangled in the rollers

To reduce the risk of injury while working around the mill conveyors, the following rules apply:

Jewelry or accessories of a similar nature that are conductive or can become entangled with mechanical parts such as conveyors are not to be worn when working.

Loose fitting clothing must not be worn around conveyors and shirtsleeves must be either buttoned at the wrist or rolled up above the elbow to prevent entanglement.

Employees are not permitted to climb onto, step or ride on the conveyor at any time.

Employees must not climb under the conveyors at any time unless the conveyor's power supply has been locked out (see lockout policy).

Employees must not put their hands on the rollers or reach for objects on the moving center section of rollers.

Employees are required to know how to use the emergency stops on the conveyors by pulling the yellow chords located on the sides of the conveyors. In an emergency, these chords must be pulled to immediately stop the conveyor.

Ensure that all staff is clear of the conveyors before starting.

Do not load conveyor beyond its normal design limits.

Removal or alteration of conveyor guards and safety devices is strictly prohibited.

Contractor Health & Safety Program

3.17 – WHMIS

Contractor Employee Education & Training All Contractor employees must be trained in WHMIS 2015 requirements and have proof of training available.

WHMIS 2015 Symbols:

	Gases under pressure	Contents under high pressure. Cylinder may explode or burst when heated, dropped or damaged.
	Flammables	Flammables (gases, aerosols, liquids, solids); Pyrophoric (liquids, solids, gases); Self-reactive substances and mixtures; Substances and mixtures which, in contact with water, emit flammable gases.
	Oxidizer	A chemical that initiates or promotes combustion (liquids, solids, gases).
	Self-reactive substances and mixtures; Organic peroxides	Products which can undergo dangerous reaction.
	Corrosion	Serious eye damage; Skin corrosion; Corrosive to metals.
	Acute toxicity (oral, dermal, inhalation)	Can cause death or toxicity with short exposure to small amounts.
	Acute toxicity (harmful); Skin irritation; Eye irritation; Skin sensitization; Specific target organ toxicity – single exposure (respiratory irritation, drowsiness or dizziness)	May cause less serious health effects.

Contractor Health & Safety Program

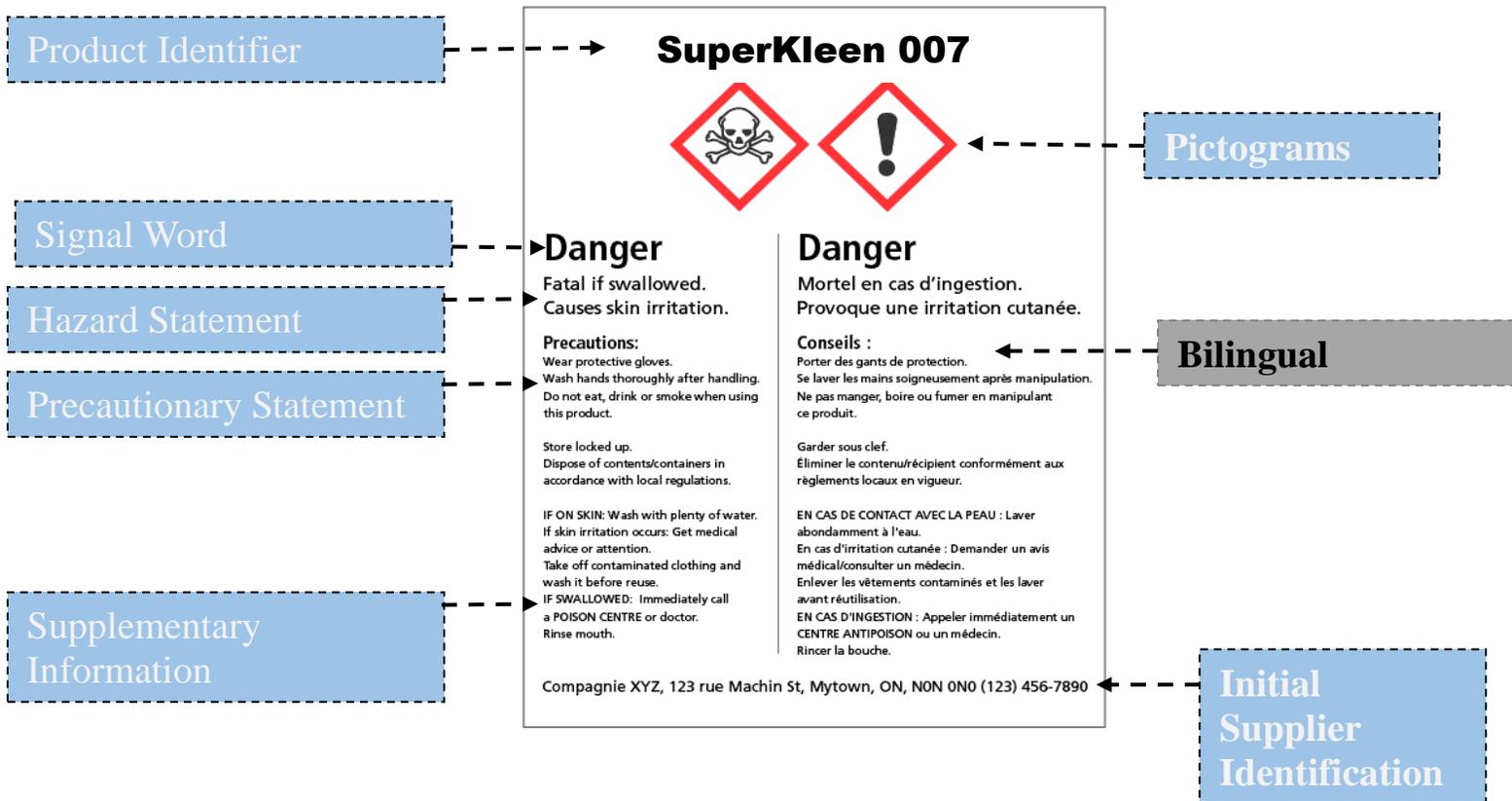
	<p>Health Hazard Carcinogenicity; Respiratory sensitization; Reproductive toxicity; Target organ toxicity; Germ cell mutagenicity; Aspiration hazard</p>	<p>May cause, or is suspected of causing, serious health effects.</p>
	<p>Biohazardous Infectious Materials</p>	<p>Organisms and toxins that can cause diseases in animals or people.</p>
	<p>Environmental Hazard</p>	<p>GHS defines an Environmental hazards group, which has not been adopted for WHMIS 2015.</p>

Contractor Health & Safety Program

Labels

WHMIS labels are extremely important because they are typically the first indication to an individual that there may be certain risks when working with a hazardous product.

WHMIS labels also indicate what precautions need to be taken in order for a worker to protect themselves from illness or injury while working with a particular chemical.



Contractor Health & Safety Program

Workplace Labels

If the supplier label should fall off or become defaced, it must be replaced with a workplace label. When transferring material from a bulk container to a secondary container, a WHMIS workplace label must also be used.

It is the responsibility of every Contractor employee to replace any missing, torn, illegible, or damaged label immediately with the appropriate workplace label.

Workplace labels can be obtained by:

- ✓ Contacting the mill Contact person or designate to arrange for a replacement workplace label (when available)

SDS

The third element of the WHMIS information delivery system is the Safety Data Sheet (SDS).

The SDS provides additional information, which is important when handling hazardous materials. Every company that manufactures and sells a product produces a supplier SDS. This information is sent to a customer whenever he/she purchases the material. SDSs are summaries of information on chemical composition, physical data, health effects and precautionary measures that must be taken when using the product. The SDS also provides you with details on the PPE required when using the material and procedures to follow in the event of an emergency. Information on clean-ups and designing controls for the safe use of potentially hazardous materials is also included.

Chemical Inventory

HSPP maintains a “Chemical Inventory” of all materials used by HSPP employees, including process inventory products. This information is available through the HSPP Health and Safety Specialist.

A complete set of all HSPP Safety Data Sheets is available through the Gatehouse online.

Unless otherwise specified in writing by the Contractor employer and HSPP, the Contractor will:

- ✓ Have a list or inventory of all chemicals being brought by the Contractor to the job site, with up-to-date Safety Data Sheets (SDS).

The chemical inventory should contain:

- ✓ The name of the material
- ✓ The amount used and stored (e.g. per month, per year, or whatever is convenient)
- ✓ The location where the material will be used or stored.
- ✓ Have an up-to-date written emergency response plan which outlines actions to be taken by the contracting employees in the event of a leak, spill, fire or explosion.

Contractor Health & Safety Program

3.18 - Confined Space Entry (CSE)

CSE

Please refer to the Confined Space Procedure

3.19 - Electrical Safety

Contractor employees may be involved in situations when they are required to access electrical equipment areas or to be involved in electrical activities.

It is an expectation of all electrical Contractors that the standards applied and followed in the course of their work will at minimum, meet the applicable standards.

3.20 - Electrical Equipment Areas & Access

Access to areas that contain “live” electrical equipment is restricted to authorized personnel only.

Authorized personnel are defined as:

- ✓ HSPP Electrical Maintenance personnel; and/or
- ✓ Contractors who have been given “short term” access, as per their Safe Work Permit.

Contractors that require short-term “unaccompanied” access into electrical equipment areas must be under the direction of HSPP Electrical Maintenance personnel.

3.21 - Embedded Services Locate Request (ESLR)

An Embedded Services Locate Request (ESLR) is a written approval that must be obtained prior to an excavation, digging, drilling, grading, piling, boring or concrete removal.

The Locate Request identifies all embedded services (e.g. electrical conduits, pipelines, telephone lines) located in the area.

The Contact person will acquire this written approval in the Safe Work Permit. Any other specific instructions or procedures will be issued prior to starting work.

If any problems occur, such as a cut conduit; the Contractor must stop work immediately and report the problem to the Contact person.

Contractor Health & Safety Program

Section 4 – Emergency Response

4.1 – Emergency Response Plan Location

The Emergency Response plan is located at the Gatehouse All contractor supervisors are responsible to ensure their employees are aware of what to do in case of an Emergency.

4.2 – Accidents/Incidents and Critical Injuries

General	If there is an injury, occurring on HSPP premises, the Contractor supervisor must immediately contact the HSPP Contact Person or designate and report to the Gatehouse for first aid.
Serious Injury	If the injury requires additional medical attention, the HSPP Gatehouse will arrange for necessary transportation to the nearest medical facility. For liability purposes, any injured person on HSPP premises is not allowed to transport themselves to a medical care facility.
Critical Injury	In the case of a critical injury or death, the Contractor supervisor must secure the scene of the accident. The scene must remain undisturbed unless a disturbance is necessary in order to eliminate danger to other persons. In such cases, the HSPP Contact Person or designate must be informed immediately.
Follow-up	As a follow-up to any accident, incident or “near miss” incident occurring on HSPP property, the Contractor supervisor must complete a copy of the HSPP Accident/Incident Report and submit it immediately to the HSPP Contact Person for review. It is the responsibility of the Contractor supervisor to take all necessary actions to prevent a recurrence of the accident and to document the actions taken.

4.3 – Fire and Evacuation

Evacuation	All employees are expected to: Upon hearing the fire alarm: <ul style="list-style-type: none">• Leave the building via the nearest exit and close any open doors behind you.• Report to the mustering area for that building.• Remain outside until given further direction by the area supervisor.
Reporting a fire	Upon discovering a fire: <ul style="list-style-type: none">• Leave the fire area immediately.• Sound the fire alarm by pulling the nearest alarm.• Close all open doors.• Leave the building via the nearest exit.

Contractor Health & Safety Program

- Call the Gatehouse who will contact the HSPP Fire Department.
- Report to and remain in your grouping area for that building.
- Remain outside until given further direction by the area supervisor.

4.4 – Environmental Spills

Spill Control

The preferred method of controlling spills is to prevent them from happening in the first place.

To prevent spills, a Contractor must use the following, either individually, or in combination:

1. Store oils or chemicals on a container pad, away from floor drains, sewer grates or where a spill could reach a sewer.
2. Inspect the condition of the oil or chemical container, drum, tote, etc., transferring the material to a new container if necessary.
3. Ensure level controls, alarms, and/or standby back-up pumps are in working condition.
4. Develop and maintain procedures to respond to a spill and instruct their employees in these procedures.

Spill Response

The Contractor must respond to a spill by:

1. If possible, stop the spill, taking into account employee safety first.
2. Prevent the spill from entering sewers by stopping the flow, diking, sealing manhole covers, floor drains and sewer grates and spreading the contents of spill kits located throughout the facility.
3. Report the spill to the Gatehouse who will contact the HSPP Fire Department.
4. In the event of a chemical spill, the Safety Data Sheet (SDS) must be consulted. Safe handling procedures, instructions in case of fire, health hazard ratings and summarized spill procedures are listed on all SDS. The SDS for any chemicals to be used by the Contractor on the job must have been supplied to the contact person.

Contractor Health & Safety Program

4.5 - Waste Management

The Contractor must comply with all Environmental laws and regulations.

Unless otherwise specified in writing by the Contractor and HSPP, the Contractor will:

- ✓ Restore the job site to a clean condition, free of all waste, debris and hazardous materials. The Contractor is responsible for removing any refuse, including empty containers (e.g. drums, cans, etc.), left over construction materials and packaging.
- ✓ All hazardous or toxic materials brought onto HSPP premises by the Contractor will be properly disposed of off-site, by the Contractor, as per legislative requirements.
- ✓ Liquid waste cannot be dumped down HSPP sink or sewer.
- ✓ Segregate any waste generated from a job and identify it as either hazardous, liquid industrial or non-hazardous.
- ✓ Waste containers shall be dated and labeled as to content. The containers shall be in good condition and impermeable to the waste it is receiving. The lid shall be kept closed unless adding more of the same waste.
- ✓ Prior to shipping off wastes, the Contractor shall ensure that shipping documents, labeling, and placarding requirements are complied with, according to legislation.

Contractor Health & Safety Program

Section 5 – Administrative Appendices

5.1 – Contractor Commitment Agreement

This program has been prepared to assist you in your business dealing with Howe Sound Pulp and Paper. The regulations and procedures set out in this manual ARE NOT INTENDED TO REPLACE OR SUPERSEDE ANY LAWS, REGULATIONS OR LIABILITY APPLICABLE TO THE WORK UNDERTAKEN BY YOU. In the event of a conflict, you must act in accordance with governing laws or regulations and report the conflict to the HSPP Contact person immediately. This manual has been registered to:

Company Name: _____

Contact Name: _____

Address: (Street) _____

(City) _____ (Province) _____

(Postal Code) _____

Telephone Number: _____

Fax Number: _____

E-mail Address: _____

I, _____, representing the above named company, fully understand and have complied with and will continue to comply with, the requirements outlined in the Howe Sound Pulp and Paper Contractor Health and Safety Program and confirm that all our employees assigned and/or sub-contractors retained to work at HSPP are in compliance with the requirements as outlined in our program.

Signed: _____ Date: _____

Copy "Commitment Agreement" for your records and return signed and dated original to:

George Turcotte
Manager, Supply Chain
george.turcotte@hspp.ca
604-741-1436

Contractor Health & Safety Program

5.2 - Contractor Employee Orientation

This section outlines the training and orientation to the HSPP Contractor Health and Safety Program that a Contractor must give their employees prior to the start of any work.

Contractors must ensure that all supervisors are trained in the Requirements of the Contractor sections of the HSPP Contractor Health and Safety Manual.

Contractors must ensure that all employees and its sub-contractors are trained in the provided sections of the Contractor Health and Safety Manual provided.

It is the Contractor's responsibility to issue and review the contents of the Contractor Health and Safety Manual in its entirety. The Contractor employee will complete and sign the acknowledgement section of the manual (see next page) and the Contractor will record that the orientation has taken place. These forms must be returned to HSPP prior to the commencement of any work.

The manuals must be carried by, or readily available on-site for reference purposes. **The orientation is valid for one year from the orientation date.**

Along with training in HSPP's Contractor Health and Safety Manual, the following items must also be reviewed:

- ✓ A review of the Contractor's own health and safety program
- ✓ Generic WHMIS awareness training, including labels and interpretation
- ✓ A review and training in any "trade-specific" high hazard concerns, including legislation requirements.
- ✓ All contractor employees must complete HSPP On-line contractor orientation.

Contractor Health & Safety Program
Howe Sound Pulp and Paper
CONTRACTORS ORIENTATION

I, _____ have read and understood HSPP
(Please print name)

Contractors Health and Safety Program manual that was supplied to me and I will follow all the Policies, Procedures and Regulations as set forth in it. I understand the hazards that relate to the job that I will be performing while on site.

I understand that if set procedures and regulations are not followed and if deemed necessary, Howe Sound Pulp and Paper reserves the right to remove any contractor representative or worker from the work site.

I will also adhere to the Occupational Health and Safety regulations, standards and guidelines while on Howe Sound Pulp and Paper property.

Contractor (Company) Name

Contractor Employee Signature

Contractor Representative Signature
(If Available)

Print Name

Print Name

Date

Date

Contractor orientation is valid for one year