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4.0 HEALTH, SAFETY AND TRAINING

4.1 Health and Safety Management

Corner Brook Pulp and Paper Woodlands is committed to providing a healthy and safe work environment for its employees and is dedicated to eliminating the possibility of injury and workplace illness. Our commitment to employee health and safety is evident in Corner Brook Pulp and Paper Woodlands Division **Health and Safety Policy** (Section 2.3 of this manual). This policy outlines the responsibilities of Company supervisors and employees pertaining to health and safety. A concise collection of Corner Brook Pulp and Paper Woodlands' documented safety procedures can be found in the **Standard Operating Procedures** binder. This binder is available to all contractors and staff as a guide in implementing the safety and environmental policies and practices of Corner Brook Pulp and Paper Woodlands.

4.1.1 Occupational Health and Safety

Corner Brook Pulp and Paper Woodlands is committed to employee health, safety, and welfare, and abides by all regulations and guidelines in the **Occupational Health and Safety Act of Newfoundland and Labrador** as they pertain to our operations. A major part of this commitment is the implementation of regular meetings of Health and Safety Committees, at the job site, district, and management levels. This three-level process ensures that all outstanding concerns brought forward on the job site level are subsequently dealt with at a higher level of management. Figure 4-1 illustrates the procedure the employee, supervisor, and CBPPL management must follow in the reporting and resolution of safety concerns.

The following outlines and describes Corner Brook Pulp and Paper Woodlands' safety meeting structure.

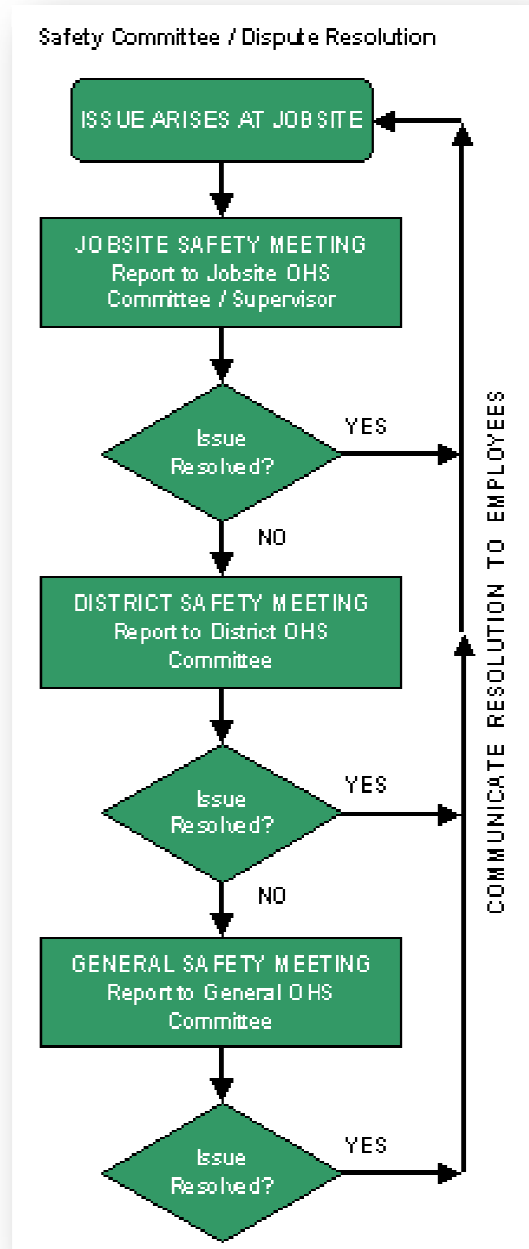
Job Site Safety Meetings

The **Occupational Health and Safety Act** requires all job sites with ten or more employees to form Health and Safety committees and hold regular meetings. Corner Brook Pulp and Paper Woodlands require this of all their contractors, regardless of the number of employees. Job site meetings are held on a monthly basis where minutes are recorded and then forwarded to the Woodlands Safety and Training Department. The Newfoundland and Labrador Workplace Health, Safety and Compensation Commission (WHSCC) also requires the completion and submission of an *Occupational Health and Safety Minutes Form* for each meeting. At these meetings, employees have the opportunity to voice health and safety related concerns. Any concerns which are not resolved at this level are referred to the monthly Operations meetings for discussion.

Operations Meetings

Operations meetings are held on a monthly basis and deal with health, safety and environmental issues. The Operations meeting is comprised of contractor job site committee representatives, employee job site committee representatives as well as Corner Brook Pulp and Paper Woodlands management and staff. The purpose of these meetings is to provide a forum in which job site committee representatives can voice outstanding job site concerns for discussion and resolution. Minutes are recorded and distributed back to the job site level for review.

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mittee / Dispute

4.1.2 Emergency Response

Although Corner Brook Pulp and Paper Woodlands is committed to providing a safe and healthy work environment for its employees, accidents can happen. Consequently each job site is required to have an *Emergency Response Plan* that is tailored specifically for that site. Each plan is located in the first section of the **Emergency Response Procedures Manual** and includes the **operating area** name and the type of forest activity. It indicates the location of first aid kits and a stretcher, and identifies first aid attendants on the jobsite. The plan also outlines the necessary procedure when an injury requires outside medical assistance, including a list of local ambulances, clinics, and hospitals. An effective *Emergency Response Plan* that is simple to follow can restore order in a time of crisis and get the help that is needed as quickly as possible.

The Company has developed an **Emergency Response Procedures Manual**, which covers emergency response procedures for personal injury, forest fires, siltation, fuel/oil (hydrocarbon) spills, herbicide spills, transportation hazards, lost employees and power line contact. It also includes an appendix outlining first aid procedures, emergency telephone numbers, incident reports, and marshalling points. All jobs operating under Corner Brook Pulp and Paper Woodlands' direction, both contractor and **company operations**, are required to have an **Emergency Response Procedures Manual** on site, available to all employees. The manual has been designed to be generic to all types of operations. It contains generic sheets to allow customization of the plan for each job site. Further details can be found in the **Emergency Response Procedures Manual**.

Emergency Response Tests

Emergency response tests are performed to ensure employees and contractors have the knowledge and skills necessary to effectively respond to an environmental or medical emergency. These tests are conducted periodically to ensure Emergency Response Plans are effectively implemented.

Emergency Response Marshalling Points

An important component of the *Emergency Response Plan* is the maintenance of *Emergency Response Marshalling Points*. An Emergency Response Marshalling Point is a location where the individual calling for outside help can meet emergency medical personnel to direct them to the injured employee. Emergency Response Marshalling Points are permanently established at strategic locations throughout Woodlands' limits and are clearly marked and individually numbered (Figure 4-2). Written instructions as to their locations (longitude, latitude or UTM map coordinates) and how to access them are given to local emergency personnel. Detailed information on Emergency Response Marshalling Points can be found in the **Emergency Response Procedures Manual**.



Figure 4-2. Emergency Response Marshalling Point.

4.1.3 Inspections

Safety inspections continue to play an important role in Corner Brook Pulp and Paper Woodlands' safety program. Regular safety inspections provide a means of monitoring and documenting safety performance as well as identifying problem areas. Safety efforts can then concentrate on these problem areas, helping to eliminate unsafe situations and behaviors.

Harvesting

Job Site Health and Safety Compliance Inspections for all harvesting and roads operations are done once per period (Winter, Summer, Fall) by District Operations Superintendents (Harvesting or Roads) or a designate. These inspections cover the following aspects of safety pertaining to harvesting:

- Personal Protective Equipment
- Maintenance Facility
- Contractor Requirements
- Chainsaws
- Heavy Equipment
- Work Procedures
- Fuel Trucks

Inspection procedures have been developed regarding each of the above items. These Procedures for Conducting Safety Compliance Inspections can be found on the *Woodlands Computer Network* in the *Woodlands Safety Folder*, under *Shortcut to EMS*.

Pre-Commercial Thinning

Pre-Commercial Thinning (PCT) Job Site Health and Safety Inspections are done on a monthly basis by a PCT Group Supervisor.

PCT safety inspections cover the following aspects:

- Personal Protective Equipment
- Work Procedures
- Job Site Requirements
- Brush Saws
- Foreman's Vehicle
- Foreman's Office
- Lunch Shelters
- Commuting Vehicles

Further details regarding this inspection can be found in the ***Pre-Commercial Thinning Supervisory Manual***. A copy of the inspection form and the *PCT Safety Inspection Template* can be viewed on the *Woodlands Computer Network* under *EMS Woodlands Safety Folder*.

4.1.4 Safety Programs

Corner Brook Pulp and Paper Woodlands is committed to implementing and developing Health and Safety Programs which will ultimately lead to a safer work environment for all employees.

Employee Worksite Orientation

All new employees or personnel moving to a different work site must be oriented regarding Emergency Response Procedures before commencing work, including the location of documentation. The Employee Worksite Orientation Form can be found on the *Woodlands Computer Network* under *EMS Manuals / Blank Forms*.

Behaviour Based Safety (BBS)

BBS, a behavior-based safety program, focuses on the elimination of unsafe behaviors in the workplace and should ultimately result in a reduction in workplace injuries. Corner Brook Pulp and Paper Woodlands is committed to the maintenance of this program through ongoing observer training. More information on BBS can be found on the *Woodlands Computer Network*.

Employee Recognition Program

The Employee Recognition Program is designed to recognize employees for exceptional long-term safety performance. Employees accumulating no lost time due to an injury for a period of five years are recognized under this program. Presentations are made annually to those who have reached individual milestones.



Figure 4-3. Employee recognition.

Monthly Employee Recognition Program

This program recognizes employees for special achievements or outstanding performance and service to the Company.

The Outstanding Performance Award is presented monthly to deserving individuals.

Safety Incentive Program

In 1997 Corner Brook Pulp and Paper Woodlands introduced the Employee Safety Performance Recognition Program (ESPRP). This program recognizes employees for their achievements of no recordable incidents while employed by Corner Brook Pulp and Paper Woodlands or its contractors. Incentives awarded have evolved from merchandise in a catalogue to hardware store gift cards. Woodlands employees are divided into work classifications and accumulate safe hours (hours without recordable incidents) on a group-specific basis. Draws for gift cards are made each week when there are no recordable incidents, and a gift card is awarded to all employees on a crew when they achieve each jobsite safe hour level.

Employee Assistance Program (EAP)

This program is available to employees and families of Corner Brook Pulp and Paper

Ltd. (Mill and Woodlands) and Deer Lake Power. It offers assistance in dealing with personal or family related matters that may affect an employee's ability to perform his/her job in a safe and productive manner. All employees are treated with professionalism and all correspondence is kept confidential. More detail, as well as contact information, can be found on EAP Posters, which are displayed in conspicuous places at all Corner Brook Pulp and Paper job sites.

Safety Chats

In 2011, a new preventive measure program was initiated by Corner Brook Pulp and Paper Ltd. Daily safety chats help employees start their shift with safety in mind.

Pre-Commercial Thinning (PCT) Safety Program

Corner Brook Pulp and Paper Woodlands' PCT Safety Program embodies all of the programs mentioned above as well as the following developed specifically for pre-commercial thinning:

- Bi-Weekly Banner
- Bush Dinner Award
- Check in-Check out
- Daily Bus Check
- Safety Messages

Detailed information on each of these safety initiatives can be found in Section 2.0 of the ***Pre-Commercial Thinning Supervisory Manual***.

4.2 Disability Management

Corner Brook Pulp and Paper Woodlands' goal is to eliminate or significantly reduce workplace injuries and illness. Diligent management of workplace injuries and illnesses will benefit employees and the Company. The following section gives an overview of how injuries and illnesses are managed within Corner Brook Pulp and Paper Woodlands.

4.2.1 Incident Reporting

The success of the Company's safety program depends a great deal on the accurate and prompt reporting of workplace injuries and illness. Diligent reporting and recording of incidents enables Corner Brook Pulp and Paper Woodlands to track the underlying causes and hazards that contribute to these incidents, thus allowing the development of policies and practices to help eliminate them. All incident reports and investigations are to be filed on the Woodlands Internet Safety and Incident Reporting Database (WISARD) on the CBPPL website (cbppl.com). Following is a list of incident types and the definitions of each:

First Aid: An injury that only requires first aid and incurs no lost time, including reported injuries that do not require treatment.

- Medical Aid: An injury that requires medical attention but the employee returns to work for the next scheduled shift.
- Restricted Injury: An injury that requires medical attention but the employee returns to work with restricted (light) duties.
- Lost Time: An injury that requires medical aid and the employee cannot return to work on the next regularly scheduled shift.
- Near Miss: An incident that had the potential to produce injury or property damage.

Details on incident reporting procedures and forms can be found in the ***Incident/Injury Protocol***, which is posted on every jobsite.

Corner Brook Pulp and Paper Woodlands can monitor their safety performance through the Occupational Safety and Health Association (OSHA) rate. This rate is determined by the number of accidents experienced based on the number of operating hours.

4.2.2 Investigations

As per the Corner Brook Pulp and Paper Woodlands Health and Safety Policy, all near miss, medical aid, restricted, and lost time injuries must be investigated. On Company-operated pre-commercial thinning operations it is the responsibility of the job Foreman to investigate incidents unless the Group Supervisor or PCT Supervisor is available. On Company contract operations, it is the responsibility of the contractor to see that necessary investigations are completed.

Whenever possible, the investigation team will consist of the following members:

- Injured employee
- Job site Occupational Health and Safety representative
- Immediate Supervisor or Contractor
- Eyewitness
- Others - At the discretion of the Supervisor or Contractor

The purpose of the investigation is to retrace the sequence of events leading up to the incident, identify the cause or hazards that existed, make recommendations to prevent recurrence, and to implement corrective measures.

4.2.3 Workers Compensation System

Corner Brook Pulp and Paper Woodlands works closely with the Workplace Health, Safety and Compensation Commission (WHSCC) with regard to injury prevention, claims management, rehabilitation, and workforce re-entry. This section outlines the Workers Compensation System and the major components therein. For more information, consult the ***Newfoundland and Labrador Workplace Health, Safety and***

Compensation Commission Employer's Guide.

Reporting

In accordance with Workers Compensation legislation, every incident resulting in or having the potential to result in an injury must be reported to the employee's immediate supervisor or designate before leaving the employer's premises (job site). Within three days of an injury, the employer must report all injuries that require medical attention to the Workplace Health and Safety Compensation Commission, initiating their involvement. Proper reporting procedures can be found in the ***Incident/Injury Protocol***, which is posted on every jobsite.

Earnings Loss

- Temporary Earnings Loss refers to a loss of earnings due to a workplace injury in which the worker is expected to make a full recovery and return to regular employment in the short term.
- Extended Earnings Loss refers to a workplace injury where the worker experiences loss of earning capacity after maximum medical involvement and rehabilitation efforts. Benefits are paid as long as the loss continues, up to age 65.

Rehabilitation

Under Workers Compensation Legislation it is the responsibility of the employer to make arrangements for rehabilitation on behalf of the injured worker, where rehabilitation is deemed to be necessary to facilitate early and safe return to work. During the rehabilitation process, the worker and employer are required to maintain weekly communication with each other and with the Workplace Health and Safety Compensation Commission. The Commission is ultimately responsible for proactively managing the rehabilitation of the worker.

Duty to Cooperate in Return to Work

Under Legislation, employers are obligated to cooperate in a worker's early and safe return to suitable and available employment. Employers are required to:

- Contact the worker as soon as possible after the injury occurs and maintain communication throughout the period of the worker's recovery or impairment.
- Provide suitable and available employment.
- Provide the Commission with information concerning the worker's return to work.

Obligation to Re-employ

Under Legislation, employers are obligated to re-employ a worker to the pre-injury or comparable position if the employer regularly employs 20 or more workers and has

employed the worker continuously for one year prior to the injury (WHSCC Act, Section 89.1).

Early and Safe Return to Work

The early and safe return to work of injured employees is extremely important to Corner Brook Pulp and Paper Woodlands because it reduces potential problems that may arise from lengthy absences from the workplace. The following programs are extremely effective in implementing an early and safe return to work program:

Modified Work:	Changing the job on a temporary basis to suit the workers injury.
Ease Back to Work:	A gradual increase in hours of work and duties.
Trial work:	Putting the worker back on full duties to see if the job can be done safely.
Accommodating the Workplace:	The employer's obligation to supply supportive devices or make modifications to the workers environment, which suit the worker's functional abilities.
Dispute Resolution:	The initiation of mediation, should issues arise that can't be resolved while developing an Early and Safe Return to Work Plan.

The Early and Safe Return to Work Program is described in detail in the ***PRIME: Early and Safe Return to Work Program*** binder.

Labour Market Re-entry

In cases where the employer is unable to accommodate the injured worker, a labour market re-entry plan may be necessary to get the person back into the workforce and may involve the following programs:

- On-the-job training
- Employment readiness
- Academic upgrading or formal training
- Entrepreneur assistance

4.3 Training

Corner Brook Pulp and Paper Woodlands is firmly committed to employee training with regard to health and safety as well as the environment. The following are policies on

training as outlined in the Company's **Health and Safety Policy** and **Forest and Environmental Policy** respectfully:

- Corner Brook Pulp and Paper Woodlands will ensure that its staff, its contractors, and their supervisors are trained and fully aware of their responsibilities relative to ensuring that employees under their supervision adhere to this policy, use safe work practices, and receive training to protect their health and safety.
- Corner Brook Pulp and Paper shall promote environmental awareness among our employees and contractors and train employees in their specific environmental and forest management responsibilities.
- Corner Brook Pulp and Paper Woodlands realizes that employee training must be meaningful, and relevant to the employee's particular job. The Company's commitment to training requires that all employees have the training they need to do their jobs in a healthy, safe and environmentally friendly manner. To this end the Company has developed a Training Matrix, which outlines mandatory training with respect to each individual job title. This information can also be accessed through PC Compliance Software, which is a program used to track of health, safety and training records in the Woodlands Safety and Training Department.

The following is a list of training, certificates, endorsements, education and licenses that may be required or offered by Corner Brook Pulp and Paper Woodlands:

Skills: Required of those operating specific pieces of equipment or machinery; offered in-house.

- Professional Logger Training
- Basic Harvester Operator
- Basic Processor Operator
- Basic Forwarder Operator
- Basic Feller-Buncher Operator
- Basic Excavator Operator
- Brush Saw Operation and Maintenance

Fire Protection: Required of certain positions; offered in-house or provided by an outside agencies.

- Fire Extinguisher Training and Inspection
- Mobile Fire Suppression Systems
- Principles of Fire Behavior
- Intermediate Fire Behavior
- Forest Fire Suppression

License Requirement: Required of specific job classifications at employee's expense; offered by outside agencies.

- Blasting Certificate
- Pesticide Applicator's License
- Provincial Scaler's License
- Class 01 Tractor Trailer
- Class 03 Tandem Truck
- Class 04 Bus Driver
- Class 05 Drivers License
- Class 08 Traction Engine

- Class 02 Bus Driver

- Endorsement 1st Class Provincial Trade Certificate

Educational Requirement: Required of Foresters and Forest Technicians; obtained at employee's expense at a recognized post-secondary institution.

- BScF or BScFE Degree

- Forestry Technical Diploma or Appropriate Technical Equivalent

Emergency Preparedness: Required of specific classifications; offered in-house.

- Response Procedures
- Fire

- Siltation Erosion
- Oil Spill Response

Computer Knowledge: Available on approval to employees to upgrade computer skills; offered by outside agencies / schools.

- Microsoft WORD
- Microsoft EXCEL
- Microsoft ACCESS
- Microsoft OUTLOOK

- Microsoft POWERPOINT
- GIS Applications
- GPS Applications

Environmental: Required of specific classifications; some offered in-house, others by outside agencies

- Environmental Awareness
- Internal EMS Auditor

- Lead EMS Auditor
- EMS Inspections

Health and Safety: Required of specific classifications; most offered in-house, others offered through outside agencies and available on approval.

- BBS for Supervisors
- BBS General Awareness
- Standard First Aid
- Incident Investigation
- Safety Committee Training
- Professional Driver Improvement Course (PDIC)
- Power Line Hazard

- Transportation of Dangerous Goods (TDG)
- Workplace Hazardous Materials Information System (WHMIS)
- Ergonomics for Equipment Operators
- Supervisory Development
- Safety Inspection

4.4 Reports, Records and Assessments

The efficient operation of health, safety, and training programs requires detailed information in the form of reports, records, and assessments. This section provides an explanation of reports that are routinely



Figure 4-4. In-house training course.

completed by the Safety and Training Department, records that are kept for future reference, and assessments on jobs and equipment necessary for safe practices.

4.4.1 Periodic Reports

Weekly Reports

The following is a description of reports generated on a weekly basis:

Weekly Summary of Injuries - summary of all medical aid and lost time injuries by contractor, pre-commercial thinning operation and staff.

Incident Reports - completed on Woodlands Internet Safety and Accident Reporting Database (WISARD) on the CBPPL website.

Weekly Incident Experience Report - tracks the accumulation of safe hours by pre-commercial thinning operations, Corner Brook Pulp and Paper Woodlands staff, and by individual on a weekly basis. The safe hour figures accumulated in this report are used to calculate frequency and severity numbers.

Incident Investigation Reports - used as required to report on all medical aid, near miss and lost time incident investigations. Details on investigations can be found in Section 4.2.2 of this document.

Monthly Reports

BBS Summary - used to summarize all BBS cards completed for a given month by contractor, pre-commercial thinning operation, and Woodlands staff. This summary breaks down the at-risk situations into five main groups: reactions of people, personal protective equipment, positions of people, tools and equipment, and procedures and housekeeping. The numbers of observations required and completed is also recorded.

Monthly Incident Experience Report - a monthly compilation of the Weekly Incident Experience Reports.

Lost Time Injury Status Report - used to keep track of the status of employees who are on earnings loss due to lost time injuries.

Severity Report - summarizes injuries by employee name and contractor. It also gives a detailed listing of every Medical Aid and Lost Time Incident for the month and a summary of days lost.

Monthly WHSCC Report - summarizes employees who are on compensation benefits and those that have returned to regular duties, showing their status, extended earnings loss, temporary earnings loss, and rehabilitation.

4.4.2 Records

The Safety and Training Department maintains all records and reports for a period of at least three years. The Safety and Training Coordinator maintains the following records:

Employee Files

A comprehensive file is maintained on all employees with regard to incidents, Workplace Health, Safety and Compensation Commission correspondence, and medical reports. Any other relevant information is also filed for future reference.

Safety and Training Database (PC Compliance)

A computer **database** program is used to keep track of training requirements and employee health and safety. This program allows for in-depth analysis of incident statistics and training needs.

Safety Meeting Minutes

Minutes of all Health and Safety Committee meetings - Job Site, District and General - are maintained.

Incident Investigations

Records of all incident investigations are maintained for future reference.

Safety Inspections (Monthly and Operating Period)

Records of all inspections are maintained for future reference.

First Aid Record Books

All job sites which fall under Corner Brook Pulp and Paper Woodlands operations must have on site at all times a **First Aid Record Book**, which details all minor incidents. The use of these books is a requirement of the Occupational Health and Safety Act.

4.4.3 Assessments, Analyses, and Procedure Manuals

Hazard Assessment

A detailed job hazard analysis was conducted on pre-commercial thinning, conventional logging, and mechanical harvesting and roads conventional logging, operations. These detailed analyses were used to break down each particular job into smaller tasks, identifying potential hazards for each task. This allowed for the implementation of remedial measures to help eliminate these hazards. Results of the analyses can be found in the **Job Hazard Analysis Manual** located at each job site.

Job Site Analysis

A detailed job site analysis, conducted by an independent consultant, analyzed several job classifications within Corner Brook Pulp and Paper Woodlands. The purpose of this analysis was to determine the physical demands of each job classification. This information is useful in planning early and safe return to work programs. Results of these analyses can be found in the ***Job Site Analysis Manual*** located at each job site.

Cable Logging Practices and Operating Procedures

The ***Cable Logging Practices and Operating Procedures Manual*** was developed to outline safe work procedures and operating practices for cable logging operations employing the use of the TLD Gauthier system. This manual is used by cable logging crews on a day-to-day basis.



Figure 4-5. TLD Gauthier cable logger.

Ergonomic Assessment

A Kinesiologist was contracted to conduct an ergonomic assessment of all mechanical harvesting machines. The resulting report, ***Ergonomic Assessment and Injury Prevention Training***, recommends improvements to create a safer work environment for Woodlands' operators.