



POLYGON

Polygon Construction Management Ltd.
(PCML)

Health & Safety Program

2016

Safety Policy Statement



January 11, 2016

Polygon Construction Management Ltd. (PCML) recognizes the right of everyone to a safe and healthy work environment and is committed to working with all parties to promote a strong Health and Safety Program that protects workers, contractors, customers, clients, the public and property on our projects.

PCML believes that all incidents are preventable. Our goal is that everyone goes home safe, every day. Active participation at all levels will ensure that our goal can be achieved.

PCML endeavours to provide proper and relevant employee training, job specific safe work practices, and safety guidelines that focus management, employee, contractor, and worker awareness on reducing the risk of incidents in all activities.

PCML, our contractors, and all workers are collectively responsible to ensure compliance with local government bylaws, the *Workers Compensation Act*, and the *Occupational Health and Safety Regulation* in regards to working safely on our projects. Everyone is responsible for cooperating and participating in the implementation of this Health and Safety Program including workplace inspections, incident investigations, and the continuous improvement of this program.

PCML is committed to safe and sustainable practices in all aspects of our operations and therefore will review and update this program on an annual basis to adapt to industry changes, and regulation updates.

Signed:




Bob Bryant
Senior Vice President Construction

Signed:



Peter Roskell
Senior Vice President Construction

Signed:



Neil Chrystal
President and CEO

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1.0 Definitions and Responsibilities

In the event this document or its associated material conflicts with applicable legislation the legislation takes precedence.

1.1 Definitions and Use

Regulation the use of the word *Regulation*, with a capitalized letter R, means the current *Occupational Health & Safety Regulation of the Workers Compensation Act of British Columbia* and any related Policies, Guidelines, and Standards

The terms of reference in this section have been written to clearly indicate the areas of responsibilities and accountability in regards to accident prevention as it applies to the following individuals:

- Safety Manager
- Construction Manager
- Site Superintendent
- Site Safety Coordinator
- Quality Supervisor
- Contractor Supervisor / Foreman
- First Aid Attendant
- Workers
- Visitors

1.2 Safety Manager

The Safety Manager is responsible for assisting with the development, implementation and monitoring of the PCML Health and Safety Program and notifying the Senior Vice President Construction and the President / CEO of any regulatory reportable incidents. He / she is to recommend policy and procedure, establish responsibilities, develop controls to ensure performance, and conduct project inspections and audits to ensure compliance with safety policies, the Regulation and other applicable laws and / or legislation.

In addition, the Safety Manager will:

- Ensure, in coordination with the Construction Manager, that all Contractor safety policies, safety plans, and relative information have been obtained by PCML.
- Ensure, in coordination with the Construction Manager, that all safety administration supplies, equipment and other necessary and relevant safety material required for each project is arranged and delivered to site prior to the commencement of construction.
- Conduct site safety inspections and audits.
- Assist project personnel in evaluating and maintaining ongoing safety initiatives.

1.3 Construction Manager

It is the responsibility of the Construction Manager to:

- Ensure each site has the required resources and personnel to implement and maintain the PCML Health and Safety Program.
- Communicate directly with the Safety Manager and contractor management personnel with respect to major safety issues and concerns.
- Review site inspection reports and consult with the Safety Manager for recommendations as required.
- Keep current on project specific safety issues through attendance at site safety meetings and/or review of site safety documentation.
- Coordinate and expedite the acquisition of any specialized safety equipment that may be required on the job site.
- Schedule pre-job safety meetings with the Safety Manager, contractors, and project supervisors.
- Advise all Contractors at execution of a contract that the PCML Health and Safety Program and all legislation must be complied with.

1.4 Site Superintendent / Quality Supervisor

The Site Superintendent with the assistance of the Quality Supervisor shall be responsible for the implementation of the PCML Health and Safety Program on his / her site. He / she will outline the program and assign specific responsibilities to contractors and individuals. He / she is accountable to the Construction Manager for the safe performance of personnel and equipment on his / her project. In the absence of the Site Superintendent, the Quality Supervisor shall adopt these roles and responsibilities unless otherwise assigned by the Construction Manager or Site Superintendent.

The Site Superintendent / Quality Supervisor must:

- Ensure that the responsibilities under [Section 1.6](#) are conducted and carried out by a competent person.
- Schedule and hold Site Safety Committee Meetings (Trade Safety Meetings) as required with a minimum of one safety representative from each Contractor that is active on the site and record the meeting minutes. Documented minutes of meetings are to be forwarded to the Safety Manager once a week.
- Ensure that all Contractors conduct and document weekly Tool Box Talk meetings. Where there are few workers on site, the Site Superintendent or qualified alternate may conduct weekly Tool Box Talk meetings with all project personnel in attendance.
- Make daily observations of safety activities on the site.
- Accompany WorkSafeBC Safety Officers during project inspections. If not available, the Site Superintendent will assign a qualified alternate to assist in the inspection.

- Discuss any corrective action required with the WorkSafeBC Safety Officer and make the necessary corrections without delay.
- Establish a maintenance schedule to ensure safe operating conditions of all tools, major equipment, lifting devices, mobile equipment and personal protective equipment (PPE).
- Ensure that all workers under their direct supervision are trained and supervised in the safe performance of their duties.
- Ensure the immediate repair or correction of hazardous conditions observed during inspections.
- Investigate accidents and reports of unsafe conditions or work procedures immediately, and initiate appropriate corrective action without delay.
- Report serious and near miss incidents in accordance with the Regulation and [Section 8](#) of this program.
- Ensure that Accident / Incident reports are completed by the immediate trade supervisor. Keep one copy on the project file and send one to the Safety Manager.
- Ensure the required number of daily site safety inspections are completed and documented (Appendix F).
- Ensure emergency procedures are developed and maintained, and workers are trained in these procedures.
- Enforce the PCML Health and Safety Program and applicable legislation at all times as well as taking disciplinary action as necessary to maintain safe performance of duties.

1.5 Contractor (Sub-Trade) Supervisor and Foreman

The Contractor Supervisor and / or Foreman shall be responsible for the safety of workers and subcontractors under their supervision. They are accountable to the Site Superintendent for the performance of personnel through safe work practices and procedures.

The Contractor Supervisor and / or Foreman must:

- Read and understand the PCML Health and Safety Program. Must be knowledgeable of, and comply with all legislation.
- Ensure all workers and subcontractors under his / her supervision complete the Site Safety Orientation (Appendix A) prior to working on site.
- Enforce all established safety regulations and work methods. Takes disciplinary action necessary to ensure compliance with the rules.
- Conduct a Job Hazard Analysis (JHA) for all tasks where moderate to high risk activities are prevalent within the scope of work. Include his / her work crew and subcontractors in the completion of these JHA's. (Appendix Y or equivalent)
- Ensure that a safety representative of the Contractor attends the weekly Site Safety Committee meeting.

- Hold a minimum of one Trade Tool Box Talk per week with his / her crew, document the meeting and submit a copy to the Site Safety Coordinator for review.
- Conduct regular inspections for unsafe practices and conditions and ensure prompt corrective action to eliminate causes of accidents and near misses.
- Complete an accident / incident report ensuring all accidents / incidents are investigated and corrective action is taken to prevent recurrence. Copies of the report are to be given to the Site Superintendent.
- Inform each worker and subcontractor under his / her supervision of the hazards associated with a job and provide the training of safe work practices required to perform that job safely.
- Impart onto each worker and subcontractor under his / her supervision an understanding that a violation of the established safety rules will not be tolerated.
- Ensure that required safety equipment and PPE are provided and used for each job.
- Observe new / young workers closely until confident of their ability to perform the assigned duties safely.
- Make certain that all injured persons are referred to the appropriate first aid or medical facilities.
- Ensure the established housekeeping standards are upheld.
- Maintain continuous visual monitoring for hazardous conditions.
- Comply with all conditions as noted in the contract documents.

1.6 Site Safety Coordinator

The Site Safety Coordinator is responsible for the daily administration of the PCML Health and Safety Program on site, assisting the Site Superintendent in the coordination of construction safety activities by Contractors, and must:

- Conduct and document orientations for all new workers on site (Appendix A).
- Ensure all aspects of the PCML Health and Safety Program applicable to the project site have been implemented.
- Post all PCML Safety Bulletins, WorkSafeBC inspection reports, and safety rules as required.
- Obtain a copy of the Fall Protection Plan for any workers that are exposed to a fall of 25 feet or greater.
- Record the name and phone number of the designated safety representative for each Contractor.
- Report all hazards to the Site Superintendent or Construction Manager and ensure control of the hazard without delay.

- Obtain and review with each Contractor a copy of their Contractor Safety Information Form (Appendix Y) or equivalent and, where appropriate, Safe Work Procedures.
- Conduct and document the required number of daily site inspections and follow up on these inspections to ensure that any corrective action required has been completed (Appendix F).
- Ensure that weekly toolbox talks are conducted and documented by each Contractor.
- Record safety infractions by visitors, delivery people or inspectors; including any fines.
- Assist Contractors in conducting frequent hazard assessments and collect appropriate documentation.
- Arrange full Site Safety Meetings every month and have workers sign in. If possible, the WorkSafeBC Safety Officer for the site should be invited to the first meeting.
- Maintain current Material Safety Data Sheets for all hazardous substances on site.
- Conduct Site Safety Committee (Trade Safety) Meetings with a representative of all Contractors and record minutes with attendance. Matters discussed should be communicated to other workers on site before the next meeting. This meeting may be conducted by the Site Superintendent.
- Ensure sub-trades are holding Tool Box Talks when they change activities and before jobs with risk of injury are started.
- Assist Site Superintendent with incident investigation, analysis and preparation of incident reports and summaries.

1.7 First Aid Attendant

The First Aid Attendant must:

- Administer First Aid in accordance with the Regulation and training.
- Ensure the onsite First Aid room is identified, accessible, neat, clean, and properly stocked with all the necessary equipment and supplies.
- Ensure the First Aid Log book is completed accurately and kept confidential.
- Keep current MSDS and WHMIS information in the First Aid Room.
- Coordinate the transportation of injured workers to a physician's office or hospital.
- Assist the Site Safety Coordinator when necessary.

1.8 Worker Responsibilities

Every worker is responsible for safeguarding his / her own health and safety as well as educating and instructing any subcontractors, visitors or guests they direct or accompany to a project site on the safety requirements of the site.

All workers must:

- Complete the Site Safety Orientation prior to commencing any work (Appendix A).
- Refuse unsafe work.
- Ensure other workers, subcontractors, visitors, or guests they direct or accompany to a PCML project site, are instructed and educated on the necessary safety requirements prior to arriving on site.
- Follow safe work practices / procedures and take an active part in protecting themselves and their fellow workers.
- Report hazardous conditions, practices and behaviour in their work areas to their supervisors.
- Report any and all injuries to their supervisor and the First Aid Attendant.

1.9 Visitor Responsibilities

Each visitor is responsible for safeguarding his / her own health and safety.

All visitors must:

- Report to the project office and obtain permission for entry onto the project site.
- Complete a Visitor Site Safety Orientation (Appendix B).
- Wear approved personal protective equipment (approved boots, hardhat, and high visibility vest).
- Comply with all directions given in the Visitor Site Safety Orientation, including regarding compliance with legislation.
- Report any unsafe acts or conditions to the Site Superintendent.
- Report any injuries immediately to the First Aid Attendant and the Site Superintendent.

2.0 Pre-Construction Planning

2.1 Safety Coordination Responsibilities

2.1.1 Construction Manager

The Construction Manager must:

- Arrange a "Pre-Construction Meeting" with the Safety Manager, Site Superintendent, Site Safety Coordinator, and Contractor safety representatives (if available) to address all aspects of individual safety responsibilities / timelines to ensure timely compliance of safety requirements before the project commences.
- Ensure all Contractors have submitted a copy of their Safety Policy and relative work safety plans (as per contract).
- Ensure each Contractor has acknowledged that they have read, understood and agree to comply with the PCML Health and Safety Program and the safety section of their individual trade contract.
- Ensure that communication, notification, and preparedness planning has been made between the site, respective emergency personnel, city by-law enforcement, and WorkSafeBC.
- Ensure all necessary permits, precautions, and safety measures have been addressed and are in place for the protection of public safety before the commencement of the project.
- Reference, obtain, and implement the Course Of Construction insurance requirements, specific to the project, to ensure compliance with the insurance policy as it relates to safety, security, lighting, hot works, etc.

2.1.2 Site Superintendent

The Site Superintendent must:

- Ensure a site specific hazard assessment and inspection is carried out to assess particular risk and necessary safety requirements for first aid, worker safety, public safety and regulation compliance.
- Ensure that a copy of the site specific WorkSafeBC Notice of Project (NOP) is posted on site.
- Establish a perimeter around the project site for the purpose of public safety (as required by jurisdiction by-law).
- Make certain that applicable safety and awareness signage is in place around the perimeter of the project prior to the commencement of any work.
- Implement the Site Specific Safety Program and develop a clear understanding of safety responsibilities and specific duties of the Site Safety Coordinator (CSO) appointed to their project.

- Ensure Contractors are knowledgeable of and responsible for complying with all regulations, laws and codes.
- Ensure that formal hazard assessments are completed prior to the commencement of each project.
- Erect a site information board (Appendix V) for safety minutes, posters, etc. and post Emergency Procedures and Emergency Telephone Numbers (Appendices E and D, respectively).

2.2 Project Security and Public Safety Responsibilities

It is the responsibility of the Site Superintendent and the Safety Manager, with the assistance of the Construction Manager, to conduct a Hazard Assessment. This entails assessing and evaluating the site and its surroundings for any necessary safety and security measures upon retaining ownership and / or responsibility of the property. The evaluation of hazards surrounding the project shall be consistent with our mandate to personal safety to prevent potential incident and / or injury by controlling available access by the public. Safety and security measures before and during construction shall also be consistent with any area regulation and / or by-laws for the protection of the public, site personnel, and equipment.

General considerations and requirements for the above are, but not limited to:

- Ensuring perimeter fencing and / or hoarding is in place around the site to prevent access (if required).
- Ensuring conditions of the site specific COC insurance policy have been met with respect to overall safety, fencing, security, lighting, hot works etc. as agreed to for the project.
- Ensuring all existing utilities have been effectively addressed where applicable (i.e. maintaining minimum separation distances from energized high voltage electrical equipment and, if applicable, submitting WorkSafeBC Form 30M33).
- Notifying the local Fire Department near the site and requesting a site visit to evaluate and assess location and conditions which may require advanced rescue planning.
- Ensuring that all necessary and current engineering drawings are on site before commencing excavation.
- Ensuring security services are retained when and where required.
- Ensuring required First Aid services and equipment are on site when and where required.
- Ensuring all safety signs are posted at all site entrances as per [Section 11.3](#) Site Safety Signage.
- Ensuring copies of the PCML Health and Safety Program and the OH & S Regulation are readily accessible.
- Ensuring an emergency contact list has been established and posted on site (Appendix D).
- Ensuring potable water is provided on site for First Aid requirements.

3.0 Job Rules

3.1 Disciplinary Action Policy

While at a workplace where PCML is the prime contractor, employer, or owner, all workers and visitors are required to abide by this Program, the Regulation, the Act, and any other applicable legislation. Many issues of non-compliance can be addressed and rectified through discussion but for repeat occurrences or where an action warrants further response, disciplinary action may be appropriate.

When PCML Site Management determines that disciplinary action is appropriate to address an issue of non-compliance they may, at their discretion, utilize any of the following disciplinary measures to correct the actions of a worker or visitor.

- Written warning
- Fine against a Contractor
- Temporary suspension from the workplace
- Permanent suspension from the workplace

Documented record of this disciplinary action (Appendix G) shall be forwarded to the Construction Manager for the project and the Safety Manager.

The Construction Manager or PCML Senior Management may determine that, at their discretion, further disciplinary action is required.

3.2 Smoking

In accordance with the Regulation, it is the policy of PCML to prevent illness or other hazards from smoking in the workplace. PCML will endeavour to prevent exposure to workers from second-hand smoke. Smoking will only be permitted outdoors, in areas designated by the Site Superintendent as smoking locations.

Smoking is not permitted in the following locations on any PCML project site:

- During refuelling or around fuel storage areas;
- Within or upon the structure being built, including parkades, balconies, and roofs;
- Areas where construction debris is being disposed of;
- Site offices, First Aid rooms, or sales areas;
- Other locations designated by the Site Superintendent as non-smoking areas.

Workers found in non-compliance of this policy will be subject to disciplinary action.

3.3 Alcohol and Drugs on Site

The bringing or consumption of alcohol or other non-prescription drugs on the job site or working while under the influence is not permitted. Workers will be removed from the site and banned from all PCML projects. Any worker taking prescribed medications must report this to their Supervisor / Foreman as well as the Site Safety Coordinator and / or First Aid Attendant.

3.4 Radios and Personal Music Players

At no time may a radio or personal music player be operated on a project site so as to interfere with effective communication between workers.

Further restriction of the use of radios and personal music players is at the discretion of the Site Superintendent.

3.5 General Rules

1. All workers on PCML projects are to follow the instructions of the Site Safety Coordinator and / or PCML Management concerning safety matters.
2. Equipment operators are responsible for the safe maintenance, operation, and required documentation of the machines and equipment that they are operating. This includes strict adherence to the established work practices and safety procedures for that equipment.
3. Workers on PCML projects must use the necessary Personal Protective Equipment when required or when instructed to do so by Site Management or the Site Safety Coordinator. High visibility vests are required when working around all mobile machinery or when required and instructed to do so by Site Management. All Polygon Staff are required to wear a vest while on any project under construction, prior to occupancy.
4. Horseplay of any type is not permitted.
5. Hardhats and protective footwear must be worn at all times. The only amendment will occur when the Site Superintendent has made an exception in writing, based on a JHA.
6. All workers must possess a valid audiometric hearing test card. The worker must be able to produce this card at any time while on the job site. Any workers not possessing a valid card shall notify the Site Superintendent. Hearing tests will be arranged.
7. Maintain a clean site. Clear and unobstructed access must be provided to all work areas. Good housekeeping is essential.
8. Site Safety Meetings will be held with all workers present once every month or more frequently as circumstances dictate by site safety personnel or at the discretion of safety management.
9. All excavation will be conducted in accordance with Part 20 of the Regulation. No worker shall enter an unsafe excavation.
10. All injuries, no matter how minor, are to be reported immediately to the Site Safety Coordinator and / or First Aid Attendant and to your Supervisor / Foreman.
11. Shirts and pants must be worn. Pants must be of sufficient length to meet the top of the footwear when the worker is standing. Shirts must have a shoulder seam and sleeve of sufficient length to cover the shoulder. Shorts and sleeveless shirts are not allowed.
12. Workers are to protect themselves from fall hazards by implementing appropriate protection measures.

13. If an impalement hazard is created (i.e. rebar dowels), then there must be effective guarding against the hazard.

3.6 Project Deliveries

All delivery people must be informed that hard hats and safety boots are mandatory on PCML sites. Delivery people are required to report to the site office on the first visit and complete the appropriate PCML Safety Orientation (Appendix A or B).

3.7 After Hours Work

Contractors wanting to work outside the regular work hours of the project must obtain permission from the Site Superintendent or their designate and remain subject to this Program, the Regulation, the Act, and any other applicable legislation. This includes providing First Aid coverage in accordance with the Regulation and observing municipal Noise Bylaws.

If two or more Contractors receive permission to work outside normal project hours, first aid coverage must be coordinated through the Site Superintendent or their designate.

Documented record of this permission shall be kept (Appendix C).

3.8 Communication

Workers must be able to effectively communicate with supervisory and safety personnel verbally or in writing. If not, a worker possessing these skills must be assigned to work with such workers.

3.9 Workplace Violence

Violence, which includes, threats, intimidation or discrimination will not be tolerated on PCML projects. Failure to comply with this section may result in a permanent ban from all current and future PCML projects.

3.10 Hot Work

Any work producing a spark or flame on or immediately adjacent to combustible material must have a Hot Works Permit issued prior to commencing the work (Appendix O). All aspects of the permit must be followed.

4.0 Personal Protective Equipment (PPE)

PCML requires the use of personal protective equipment (PPE) where it is required by the Regulation, hazard assessment, or site rules.

4.1 Selection

PPE will be selected for each task based on the requirements of the Regulation, the manufacturer recommendations, and any applicable Safe Work Practice, Procedure, or JHA.

4.2 Care and Use

All PPE shall be maintained in good working order and used in accordance with the manufacturers recommendations. PPE shall be regularly inspected and replaced without delay when deficiencies are identified.

4.3 Personal Clothing

Workers shall be properly attired on PCML construction sites. The minimum requirement for personal clothing on a Polygon Construction Site is a shirt that completely covers the shoulders and reaches the waistline, and pants that meet the top of the footwear when standing. Furthermore, clothing shall be appropriate for the work being performed.

4.4 Footwear

Footwear meeting the requirements of the Regulation and providing protection appropriate to the overall conditions of the site must be worn and maintained in good condition.

4.5 Protective Headgear

Protective Headgear (hard hats) meeting the requirements of the Regulation must be worn in accordance with the Regulation where required by site conditions or rules.

4.6 Hearing Protection

CSA / ANSI approved hearing protection must be worn when the noise level in a work area exceeds the permissible occupational exposure limit; typically noise greater than 85 decibels. All workers on PCML projects must have their hearing tested annually and be able to provide a valid certificate as proof of testing.

4.7 Respiratory Protection

All workers on PCML projects who are exposed to potential hazards associated with airborne contaminants are expected to participate and comply with a project specific respiratory protection program which includes receiving proper instruction and training on:

- Responsibilities
- Use of Respirators
- Respirator Selection
- Dual Cartridge Respirators
- Pressure Fit Testing
- Inspection and Cleaning
- User Cooperation and Monitoring
- Records

All workers required to wear respiratory protection must be clean shaven where the respirator contacts the face to ensure a proper seal is maintained.

5.0 Environment / Exposure / Hygiene

5.1 Workplace Hazardous Materials Information System (WHMIS)

Workplace information includes knowledge of the hazards of the workplace and of the materials used in the workplace. The Workplace Hazardous Materials Information System (WHMIS) is a major response to the worker's right-to-know about safety and health hazards of materials used in the workplace.

WHMIS legislation provides employees, employers and suppliers nationwide with specific vital information about hazardous materials through the key elements of:

- Controlled product labelling
- Material Safety Data Sheets (MSDS)
- Worker education and training programs

On the basis of WHMIS and other workplace information, PCML has developed work procedures that ensure worker health and safety. Workers must be educated in hazards and trained in work procedures.

5.1.1 Chemical Inventory

A current inventory of hazardous materials, which identifies all hazardous substances and their quantities at the workplace, must be maintained. A chemical inventory includes the chemical name (formula) of the material and the size of its container. Regular inventories allow for the following:

- To check ethers and other chemicals with limited shelf life
- To remove surplus hazardous chemicals
- To remove chemicals that you have not used in the past 1 – 3 years.
- To correct incompatible storage.
- To identify the chemicals which are present.

5.1.2 WHMIS Program

PCML implements the WHMIS program using information provided through WHMIS as well as other information from the workplace. WHMIS information is in the form of labelling and MSDS. Other workplace information includes knowledge of the hazards of the workplace, use of hazardous materials that depend upon factors such as quantities used, work processes and work location.

To assist in the implementation of this WHMIS program, each employer / contractor will:

- Assign responsibility for program implementation within their company.
- Establish an inventory of controlled products.

- Collect data on products produced in the workplace and determine if they are controlled or not.
- Ensure that WHMIS labelling and data sheets are in place and submitted to the Site Safety Coordinator.
- Provide workplace labelling where required for all products used within their scope.
- Prepare MSDS and appropriate labels for controlled products produced in the workplace.
- Determine the hazards of controlled products in the workplace.

5.1.3 Workplace Controls

Each employer shall establish workplace controls, based on hazard evaluations, which could include:

- Engineering controls: i.e. ventilation, process modification and isolation of the source.
- Administrating controls: i.e. work procedures, storage arrangements, maintenance and time scheduling.
- Personal protective equipment used only in situations where other controls are not practicable.
- Establishing emergency procedures
- First aid measures
- Fire-fighting / evacuation measures (notify fire departments of hazardous materials).
- Procedures to handle spills or accidental release.
- Providing worker education and training.

All employers are to ensure their employees have received WHMIS training. All supervisors and employees are to monitor products / materials arriving on site for WHMIS labels. Product / materials displaying WHMIS labels indicate they are 'Controlled Products' and must be accompanied by MSDS. These products / materials are not to be used until the MSDS is available on site.

Prior to use of the Controlled Product, the Supervisor / Foreman will review the WHMIS label and MSDS and advise his / her employees of the safe work procedures to be followed. The Site Safety Coordinator shall keep a record of all hazardous products on site. (Appendix I)

Copies of MSDS are to be given to the Site Safety Coordinator prior to the use of the product / material in accordance with OH & S Regulation. This will enable the Site Safety Coordinator to coordinate work procedures for all trades on site. MSDS information records must not be older than three years from the date they were developed.

5.2 Environmental Protection

PCML is dedicated to acting responsibly and demonstrating accountability in the management of the property and affairs of its projects with regard to protecting the environment. All employers, contractors and individuals associated with each project shall share this responsibility for protecting the environment.

The purpose of this Environmental Protection Program is to:

- ensure compliance with all applicable environmental regulations at all sites of activity.
- meet all legislated requirements as a minimum standard.
- provide communication and education about environmental issues.
- provide a framework for establishing procedures that will ensure a consistent response to environmental issues.
- demonstrate responsibility and due diligence.

5.2.1 Worker Responsibilities

The responsibility of every worker, employee, or staff member is to:

- Minimize environmental impact by participating in a Reduce, Reuse, Recycle program.
- Follow established PCML or regulatory procedures and policies for the protection of the environment.
- Report to their supervisor all accidents / incidents which may harm the environment.

5.2.2 Planning

The environmental impact of all new projects or activities shall be assessed at the Pre-Construction Planning stage. Ongoing monitoring will be conducted throughout the project by site management. Where possible, efforts will be taken to minimize any adverse impacts. Contractors and / or employers shall follow the guidelines set out by site management with respect to policies and procedures for waste management and environmental concerns.

5.2.3 Handling and Disposal

Disposal of hazardous wastes will be conducted in accordance with all applicable regulation, legislation and / or city by-laws that govern the area. All individuals handling hazardous materials or conducting activities that could impact the environment must be trained. Training records are to be documented and maintained up to date.

5.3 Exposure Control Plans

If a worker may be exposed to a harmful substance, the employer must ensure that:

- A walk through is conducted to assess the potential for overexposure, taking into account all routes of exposure including inhalation, ingestion and skin contact.
- Reassessment is conducted when there is a change in work conditions which may increase the exposure, such as a change in production rate, process or equipment.

Employers / contractors who are required to develop Exposure Control Plans as per regulation must include the following (when applicable):

- Purpose and Responsibility
- Risk Identification Assessment and Control
- Education and Training
- Written Work Procedures
- Hygiene Facilities
- Health Monitoring
- Documentation

A copy of the Exposure Control Plan must be provided to the Site Safety Coordinator prior to beginning the work.

5.4 Concrete Grinding

An Exposure Control Plan is required for concrete grinding, cutting or coring which has an effective 'Engineering Control System'. Engineering Control Systems include:

- NIOSH (Controllable Dust and Particulate Masking System)
- LEV (Local Exhaust Ventilation)
- Vacuum / Hose / Shroud (Equipment Ventilation)

6.0 Training and Safety Meetings

6.1 New Worker Orientation

Orientation of new workers is mandatory and must be completed prior to commencement of work on all sites. It is the responsibility of the supervisor / foreman to ensure their workers have completed the Site Safety Orientation prior to starting work (Appendix A). All new employees will receive a Site Safety Orientation decal.

NO ORIENTATION, NO WORK!

6.2 Job Specific Training

Job specific training of workers is conducted in, but is not limited to, the following situations:

- When a new worker is hired.
- When a worker is assigned to new or different work.
- When a worker is moved to a new site or location.

This training will be conducted by the worker's immediate supervisor and will contain the following items:

- Review of safe work practices and procedures that apply to the specific job.
- Be made aware of all known safety hazards that may affect the worker.
- Determine just what the worker can do and how he / she does it. This includes both discussion with the worker and observation of how he / she does the work.
- Provide the worker with all information that is necessary to do the job safely and correctly.

Depending on the complexity of the job and the worker's skill / experience level, job specific training may take anywhere from a few minutes to several months. Ensure training documentation is kept on site and made available to PCML upon request. The ongoing monitoring and coaching of the worker is a major duty and responsibility of that worker's immediate Supervisor / Foreman.

6.3 Tailgate / Toolbox Meetings

Supervisors or Foremen will hold individual "Tool Box Talk" meetings with their crews on a weekly basis. Safety issues pertinent to the crew's immediate work, such as special procedures and safe work practices, shall be discussed.

Any safety concerns brought up at the toolbox meeting will be investigated and when verified, will be rectified without delay. A copy of the "Tool Box Talk" meeting minutes must be forwarded to the Site Superintendent weekly for review (Appendix J or equivalent).

6.4 Site Safety Committee

The Site Safety Committee shall assist in creating a safe place of work. It shall recommend actions which will improve the effectiveness of the safety program and promote compliance with the Regulation. Each PCML project site will form a committee in the following manner.

The meetings of this committee are also referred to as Trade Safety Meetings.

6.4.1 Guidelines

- The meetings must occur regularly.
- The meetings should be separate from the monthly Site Safety Meeting.
- The meetings must be documented with minutes posted and filed.

6.4.2 Committee Membership

- One representative of each appropriate contractor must attend.
- There must be no fewer than four regular members employed at the jobsite and experienced in the types of work being performed at the jobsite.
- Membership chosen by and representing the workers and the employer. In no case shall the employer's representatives outnumber the worker's representatives.

6.4.3 Committee Duties

Site Superintendent Duties

The Site Superintendent is responsible for:

- Arranging the meeting time, date and place.

Site Safety Coordinator Duties

The Site Safety Coordinator is responsible for:

- Preparing the agenda.
- Reviewing previous minutes and new materials.
- Chairing the meeting.
- Recording, preparing and distributing minutes.
- Notifying members of meeting.
- Reporting the status of recommendations.

Committee Duties

The committee has the following duties and functions in relations to its workplace:

- Identify situations that may be unhealthy or unsafe for workers and advise on effective systems rectifying those situations.
- Consider and expeditiously deal with complaints to the health and safety of workers.

- Consult with workers and the employer on issues related to occupational health and safety and environment.
- Make recommendations for the improvement of the health, safety and occupational environment of workers.
- Advise on proposed changes to the workplace or the work processes that may affect the health and safety of workers.
- Ensure that accident investigation and regular inspections are carried out as required by the *Workers Compensation Act* and the Regulation.
- Participate in inspections, investigations and inquiries as identified in the Regulation.

Safety Committee Meeting Typical Agenda

- Call to order.
- Roll call – Chairman introduces any guests or visitors present.
- Review business arising out of previous minutes.
- Reading of relevant correspondence and reports.
- Incident / Accident, near miss review.
- Recommendations and suggestions.
- Discuss the work schedule and its impact on safety.
- New business.
- Set date, time and location for next meeting.
- Adjournment.

The appropriate form, or equivalent, shall be completed for each meeting (Appendix K or equivalent).

7.0 Inspections and Hazard Assessments

Work site hazard assessments and safety inspections are key activities in the prevention of accidents. Their purposes are to:

- Identify existing and potential hazards.
- Increase awareness leading to the prevention of workplace accidents and illnesses.
- Ensure compliance with standards and regulations.

WorkSafeBC requires that hazards to the safety and health of workers are identified and brought to management's attention. It is the workplace management's responsibility to ensure that the identified hazards are eliminated and, where this is not practicable, to ensure the hazards are controlled and that workers are protected from the hazards.

To meet this requirement, employers must conduct:

- Hazard assessments prior to all new projects, jobs or processes, or the introduction of new equipment or hazardous materials. (see Appendix Y)
- Regular workplace inspections.

PCML will provide all necessary resources to ensure that hazard assessments and workplace inspections are effective. These include:

- Hazard recognition and safety inspection training for inspectors.
- Time for inspectors to complete their duties.
- Established communication channels between inspectors, local safety agencies and senior management.
- Quick action on recommended corrections.

All assessments and inspections shall be documented.

7.1 Hazard Assessments / Job Safety Analyses

A hazard assessment or job safety analysis is recommended prior to the start of any new project, task or job. Its purpose is to anticipate, as much as is reasonable, any hazards or hazardous conditions that are inherent or could arise out of a new project, task or job. Once the hazards have been identified, the controls for eliminating or minimizing these hazards can then be determined and implemented. Hazard assessments should also be undertaken when major modifications are made to a project, task or job.

The preliminary hazard inventory that is included in Appendix Y has been designed to anticipate any hazards that may be found in the workplace. A modified version of this form, or one designed to reflect the nature of the hazards found in other types of working environments may be used.

7.2 Inspections

Informal inspections will be conducted by supervisors on an ongoing basis in their areas of responsibilities. Formal safety inspections shall be conducted and documented by the Site Safety Coordinator or designate on the job site on a daily basis. The PCML Inspection Program comprises of three types of inspections that are structured as follows.

7.2.1 Informal Workplace Inspections

All employees are expected to maintain continual awareness of hazards in their work areas. This is accomplished by supervisors conducting regular walk-throughs of their areas of authority and by workers checking their work areas prior to commencing work. No formal inspection report is required; however, any detected hazards must be corrected immediately if the task is within the employee's capabilities. If not, the hazard should be reported to the area supervisor or management for correction.

7.2.2 Formal Workplace Inspections

All PCML projects will be inspected / audited on a quarterly basis by the PCML Safety Manager or his / her designate.

Each site inspection will produce a site specific inspection report that will be forwarded and reviewed by each construction manager and superintendent. The site management team must ensure that any corrective action arising from these reports is taken so that the hazard is eliminated or controlled. These completed reports shall be compiled into a quarterly safety report to be forwarded to senior management and the Head Office Occupational Health and Safety Committee for review.

PCML will also conduct an annual internal Certificate of Recognition (COR) Audit as well as schedule an external audit (once every three years) to maintain the company's COR status and help us measure our progress.

7.2.3 Special Inspections

Special inspections take place immediately after a malfunction, accident or after a new work procedure or piece of machinery is introduced. The Superintendent and a worker representative (preferably a safety committee member) conduct this type of inspection. The Superintendent must ensure that any existing unsafe condition is effectively controlled before commencing an inspection or investigation.

8.0 Accident / Incident Investigation

8.1 Investigation Procedure

The purpose of accident / incident reporting and investigating is to prevent a recurrence of the hazardous condition causing the event. The *Workers Compensation Act* requires all employers to investigate and report any accident which:

- resulted in injury requiring treatment by a medical practitioner
- resulted in death or critical condition
- involved a major structural failure or collapse
- involved the major release of a toxic or hazardous substance
- was a blasting or diving accident
- did not result in an injury but had the potential for causing serious injury (near miss).

All accidents / incidents with potential of injury or property loss shall be reported to the Site Superintendent immediately. He / she will initiate an investigation. The Contractor is also responsible to conduct an accident / incident investigation and submit it to the Site Superintendent and / or Site Safety Coordinator (See Appendix M). All reports shall be forwarded to the Safety Manager.

8.2 Accident / Incident Notification Protocol

In the event of an incident that involves referral to medical aid, fatal injuries, structural collapse, fire, flood, substantial equipment failures, release of a toxin or hazardous substance or near miss situations, the following notification protocol must be used.

After assessing the situation and securing the safety of the public and the other workers, the **Site Superintendent** must call or assign a designate to call:

1. The pertinent emergency services (ambulance, police, gas utility, electric utility, etc.)
2. The WorkSafeBC area delegate
3. The PCML Safety Manager
4. The PCML Construction Manager responsible for the site

The **PCML Safety Manager** must immediately advise:

1. The PCML Senior Vice President Construction assigned to the Project

The **PCML Construction Manager** must immediately advise:

1. The PCML Senior Vice President Construction assigned to the Project and the President, if unable to contact the Senior Vice President
2. The PCML Senior Vice President Construction will advise the President and other senior management as deemed appropriate for the situation.

8.2.1 Accident / Incident Notification Follow-up

In the event of a worker being referred to Medical Aid the **Site Superintendent** or their designate will contact the Safety Manager by the end of the work day to provide an update on the status of the worker regardless of whether or not the status of the worker has changed.

The **Safety Manager** will communicate this information to the Construction Manager and the Senior Vice President for the project.

9.0 Emergency Preparedness

WorkSafeBC requires all employers to provide employees with a quick and effective response in the event of injuries or emergencies. First aid and emergency preparedness are an important part of this PCML Health and Safety Program.

The purposes of these services are to:

- Ensure prompt and effective emergency responses.
- Promote speedy recovery and to minimize the effects of injuries or exposures.
- Provide workers with assistance when required.

The success of first aid and emergency preparedness depends on employees knowing what to do in any emergency situations. Supervisors are required to communicate emergency numbers and procedures to workers during orientation training and to regularly bring up this information during safety meetings. In addition, risks associated with the projects' work process and their control measures must also be communicated and understood. Annual emergency and evacuation drills are practiced to ensure awareness and effectiveness of emergency routes and procedures. All training, meetings and drills shall be documented.

Employers will provide all of the tools and resources required for these programs to be effective.

These include:

- Appropriate emergency response plans and equipment.
- Training and annual retraining of company emergency responders.
- Time made available to allow key players to complete their duties.
- Established chain of command for emergency situations.

The Site Safety Coordinator and / or First Aid Attendant will establish the emergency response plan for Medical and Fire Emergencies, which includes the Emergency Response Team.

The site plan must indicate access gates, streets, meeting points, emergency telephone numbers, emergency air horn and fire extinguishers, hospital routes, site office and first aid location. This plan must be updated regularly.

9.1 Earthquake Plan

As with a fire, it is impossible to determine the type and extent of the damage the building would receive. The intent of these guidelines is to offer a preconceived plan of action and to act as a tool for the education of workers.

Earthquakes vary in duration, intensity and pattern and can be very destructive. Please read and consider these guidelines as you go about your job.

If you are inside the building:

1. Stay calm, drop, cover and hold on.
2. Do not attempt to exit the building while the shaking is occurring.
3. Get to a position of safety; i.e. away from objects that can fall on you and hurt you, away from edges of the slabs or floor openings. Sit in an inside corner or other structurally sound point and keep out from under any temporary forms or structures. Do not hesitate, move at once.
4. Do not leave your position of safety until the shaking stops. If you have no position of safety, do what you can to protect yourself. Get down in a forward position and hold your hands over your head clasped together to protect your neck, and keep your hard hat on.
5. After the shaking has stopped, move to the emergency assembly area shown on the site plan and report your name and any injuries. If you are hurt and unable to move, remain calm to conserve energy and call out for help. Rescue teams will be organized to search for the injured. If on the way to the assembly area you find an injured worker, report the location ASAP. Do not move an injured worker as you can complicate injuries. Move the worker only in life-threatening situations. Minimize back and neck movement.
6. Be aware of aftershocks, as you may have to repeat the above.
7. Greatest dangers:
 - Falling Objects
 - Swinging doors and broken windows
 - Fires
 - Electrical Hazards

If you are outdoors:

1. If possible, move to an open area.
2. Assume a position of safety and keep low.
3. Keep out of harm's way i.e. away from stored materials, trees, mobile equipment, gas or chemical storage, motor vehicles, crew and office trailers or any other objects that can fall on you.
4. After the shaking has stopped, move to the emergency assembly area and report in with your name and any injuries. If you are hurt and unable to move, remain calm to conserve

energy and call out for help. As mentioned before, do not move an injured worker. Get help.

5. Be prepared for aftershocks.

After the earthquake has ended:

The Site Superintendent or his / her designate will ensure:

- Triage and first aid of injured workers has started.
- A head count be conducted listing the last known location of any missing workers.
- Rescue teams be formed to assist the injured and to search for any missing workers.
- If necessary, hazardous utilities, gas / electricity be located and shut off.

No worker is to leave the site without authorization by the Site Superintendent.

9.2 Additional Information

In case of a major disaster, emergency shelter locations will be broadcast by Emergency Services Radio. At this time the local authorities will advise the public how to contact family members. If everyone stays calm, follows procedures and the direction of the Emergency Services, we will all get back to order sooner.

10.0 Records

10.1 Accidents / Incidents and Injury Statistics

PCML and the Regulation require the gathering of statistics for all accidents / incidents to assist in the development of the Accident Reduction Program. Each Site Safety Coordinator will keep accident / incident statistics and have them available upon request. This information must include:

- The frequency of accidents and incidents.
- Pertinent severity measurements.
- The projected cost of accidents (if known).

This information will be available on a “per project” basis for review by the Site Safety Committee, and the PCML Safety Management.

10.2 Other Records and Statistics

The Site Superintendent will keep the following records:

- All appropriate drawings and Engineer's Inspection Reports.
- All required variance documentation.
- All Municipal Inspection Reports.
- All Site Meeting minutes including Health and Safety Reports.

The Site Safety Coordinator and / or First Aid Attendant will keep the following records:

- First aid reports.
- WorkSafeBC inspection reports.
- Accident / incident / near miss investigation reports.
- Material Safety Data Sheets.
- Work Site Inspection Reports.
- All Safety Meeting Minutes.
- Trade specific safety (Tool Box Talk) meeting records.
- Completed Site Safety Orientation forms and training records.

The Site Safety Coordinator will collect and file these statistics for review by the Polygon Health and Safety Committee. This committee will institute new safety regulations if required to improve this PCML Health and Safety Program.

11.0 Site Specific Safety

It is the responsibility of the Site Superintendent and Site Safety Coordinator, with coordination of the Construction Manager, to ensure the requirements listed in this program are implemented without delay.

11.1 Contractor Health and Safety Management

In accordance with Section 3.1 of the Regulation, where employers are required to have a formal Health and Safety Policy, it shall be the responsibility of the employer (primary contractor) to submit a copy of their Health and Safety Policy (contractors, trades, sub-trades retained by the primary contractor) to PCML before the commencement of work. All contractors shall also submit a completed Contractor Safety Information Form (Appendix Y) or equivalent prior to starting any high hazard work on site, which will:

- Describe how the work will be conducted safely.
- Identify the person on site at all times to coordinate safety.

It shall be the responsibility of the Site Safety Coordinator to ensure these forms and safety programs are collected from the Contractors along with the names of the Trade Safety Coordinator or Safety Representatives.

11.1.1 Hazard Assessments and Worksite Inspections

The Regulation requires contractors (employers) to ensure that hazards to the safety and health of workers are identified and brought to management's attention. It is the employer(s) management's responsibility to ensure that the identified hazards are eliminated and, where this is not practicable, to ensure the hazards are controlled and that workers are protected from the hazards.

To meet this requirement, all contractors working on PCML projects will be required to conduct initial and ongoing hazard assessments prior to commencing work on all new projects, jobs or processes, or the introduction of new equipment, or hazardous materials. As well, every employer will be responsible to conduct and document regular informal workplace inspections. Please review [Section 8](#) for further details.

11.1.2 Hazard Assessments / Job Safety Analyses

A hazard assessment or job safety analysis is recommended prior to the start of any new project, task or job. Its purpose is to anticipate, as much as is reasonable, any hazards or hazardous conditions that are inherent or could arise out of a new project, task or job. Once the hazards have been identified, the controls for eliminating or minimizing these hazards can then be determined and implemented. Hazard assessments should also be undertaken when major modifications are made to a project, task or job. The preliminary hazard assessment and job safety analysis checklist that is included in Appendix Y has been designed to assist contractors to anticipate any hazards that may be found in their workplace.

A modified version of this form, or one designed to reflect the nature of the hazards found in other types of working environments may be used. Ongoing supervisory and safety

committee inspections are expected to identify hazards that develop throughout the project, task or job. For assistance in completing the hazard assessment or job safety analysis form, please consult your project site safety representative or call the PCML Safety Group at 604.871.1131.

11.2 Site Specific Health and Safety Program Responsibility

Contents of this PCML Health and Safety Program shall be completed and implemented as per instructions before the project begins and work commences to ensure that all workers have the necessary information needed and required for safe work practices and procedures on site.

11.2.1 Responsibility:

The Project (Site) Management Team and / or Site Safety Coordinator or his / her designate will ensure:

1. A pre-construction meeting has been scheduled according to [Section 2](#)
2. A proper filing system for record keeping will be implemented. The Site Superintendent or his / her designate will ensure record keeping as stated in [Section 10](#) and implement changes for any future revisions.
3. Confirm all trades have submitted a copy of their Safety Policy and relative work safety plans (as per contract) to the Safety Group prior to the commencement of any work by that trade.
4. All primary contractors have completed and submitted the Contractor Safety Information Form listing all sub-trades retained and / or working under their company complete with relevant supervisor and safety representative information. (Appendix Y)
5. All necessary permits, precautions, and safety measures have been addressed and / or in place for the protection of public safety before the commencement of the project.
6. The PCML Site Specific Safety Program is constructed, implemented and kept up to date and initiate changes to the program when / where needed as project dictates. Post all safety related documents on the safety bulletin board to ensure ease of access. (Appendix V)
7. Proper company and safety signage at a minimum required is posted as well as any additional signage to ensure safety and site specific needs.
8. The Weekly Record of Site Safety Activity form (Appendix X) is completed and submitted to the PCML Safety Group in a timely manner.

11.3 Site Safety Signage

Any signage deemed necessary to provide further communication for worker and / or public safety shall be used on all sites and implemented as per site specific requirements without delay.

12.0 Sales Site Tours / Showings / Visits

As a measure to minimize the potential risk of injury to sales personnel and customers, the following procedure is to be used for sales site tours and suite showings while the project is under construction.

- All requests for site tours must be directed to, and approved by, the Site Superintendent.
- Site visit requests must be presented by 12:00 pm (noon) on the day prior to the requested visit.
- Site tours are restricted to non-working hours at times mutually agreed upon by the Site Superintendent and the sales representative.
- All visitors must be accompanied at all times by a sales representative who, in turn, must be accompanied by the Site Safety Coordinator or approved designate.
- All visitors must be equipped with hard hats and safety footwear (as provided by the Sales Representative).
- All visitors must successfully complete and sign a site safety orientation prior to entering the site.
- Groups to be limited to a maximum of four (4) attendees per tour, plus the Sales Representative.
- Regrettably, for safety reasons we cannot accommodate children attending the site visit.
- Access to balconies and any other areas deemed unsafe by the Site Safety Coordinator are prohibited during the tour.
- Site tours may be denied if the site conditions are deemed to be unsafe by the Site Superintendent and / or Site Safety Coordinator.

Please ensure that all staff comply with these requirements.