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## **1.0 Purpose and Scope**

GFI Composites is committed to the health and safety of all workers who work on behalf of GFI Composites. This health and safety manual has been prepared to profile the GFI Composites approach to workplace health and safety in fulfillment of that commitment. The GFI Composites health and safety manual consists of a number of program elements, including:

**Leadership and Administration**

**Worker Health & Safety Designate**

**Safety Program and Management System**

**Hazard Recognition, Evaluation and Control**

**Workplace Safety Inspections**

**Incident Investigation System**

**Safe Work Practices and Procedures**

**Education, Training and Communications (including Orientation)**

**WHMIS**

**Company Rules and Procedures**

**Maintenance**

**Emergency Management and Preparedness**

**Records and Statistics**

**Legislation and Compliance**

**Physical Plant and Housekeeping**

**Personal Protective Equipment (PPE)**

**Harassment**

**Disability Management and Early and Safe Return to Work**

**Environmental Management**

**Ergonomics**

## **2.0 Leadership and Administration**

### **2.1 General**

GFI Composites has instituted its Occupational Health & Safety System to ensure that workers are provided with an environment that neither impairs their health nor imperils their safety.

### **2.2 Health & Safety Policy**

In consultation with workers and the worker health and safety designate, GFI Composites senior management shall establish and maintain the organization's OHS policy and shall ensure that the policy:

- is appropriate to the nature, scale, and OHS hazards and risks associated with GFI Composites activities;
- includes a commitment to comply with the worker health and safety designate and applicable OHS legal requirements and other requirements;
- includes a commitment to protect workers and to ensure continual improvement;
- is documented, implemented, and maintained;
- is posted and communicated to all workers

The GFI Composites Health and Safety Policy shall be reviewed on an annual basis and shall also be dated within the previous twelve months. The GFI Composites Health and Safety Policy shall also be reviewed in consultation with the worker health and safety designate to ensure that the OH&S Policy is appropriate to the workplace and the health and safety goals set are realistic to the operations of GFI Composites.

**Reference: GFI-HSE-POL-001, Health & Safety Policy**

### **2.3 GFI Composites - Roles and Responsibilities for Workplace Safety**

GFI Composites strongly believes that leadership, both by management and workers, is very important for the success of our health and safety management system and the individual and collective aspects of our prevention initiatives. We believe that only through leadership and an understanding of our individual and collective roles and responsibilities for safety can our health and safety efforts be effective.

GFI Composites shall ensure, where it is reasonably practicable, the health, safety and welfare of all workers. Specifically, GFI Composites shall:

- provide and maintain a workplace and the necessary equipment, systems and tools that are safe and without risk to the health of our workers;

- provide information, instruction, training and supervision and facilities that are necessary to ensure the health, safety and welfare of our workers;
- ensure that our workers, and particularly our supervisors, are made familiar with health or safety hazards that may be met by them in the workplace;
- conduct our work so that people not employed by GFI Composites are not exposed to health or safety hazards as a result of our work;
- ensure that our workers are given operating instructions on the use of devices and equipment provided for their protection;
- consult and co-operate with the worker health and safety designate on all matters respecting occupational health and safety at the workplace;
- respond in writing within 30 days to any recommendation of the worker health and safety designate indicating that the recommendation has been accepted or that it has been rejected, with a reason for the rejection;
- provide periodic written updates to the workplace health and safety designate and all staff on the implementation of a recommendation accepted by the employer until the implementation is complete;
- consult with the workplace health and safety designate at the workplace about the scheduling of workplace inspections that are required by the regulations, and ensure that the workplace health and safety designate participates in the inspection.

## **2.4 Duties GFI Composites Supervisors**

All GFI Composites supervisors shall ensure, as reasonably practicable, the health, safety and welfare of all workers under their supervision.

GFI Composites supervisors shall:

- advise workers under their supervision of the health or safety hazards that may be met by them in the workplace;
- provide proper written or oral instructions regarding precautions to be taken for the protection of all workers under their supervision; and
- ensure that all workers use or wear protective equipment, devices or other apparel that the Occupational Health and Safety Act, regulations or GFI Composites policy or procedure requires to be used or worn.

## **2.5 Duties of GFI Composites Workers**

Every GFI Composites worker, while at work, shall take all reasonable care to protect their own health and safety and that of workers and other persons at or near our workplace.

All GFI Composites workers shall:

- cooperate with GFI Composites and with other workers to protect their own health and safety, the health and safety of other GFI Composites workers and the health and safety of



- other workers or persons not working directly for GFI Composites but present at or near the GFI Composites workplace;
- use devices and equipment provided for their protection in accordance with the instructions for use and training provided with respect to the devices and equipment;
  - Consult and co-operate with the workplace health and safety designate.

## 2.6 Health and Safety Objectives

On an annual basis, GFI Composites shall establish and implement health and safety objectives to advance the implementation, effectiveness and improvement to our health and safety program. The objectives shall be measurable, where practicable, and consistent with the GFI Composites safety policy.

When establishing and reviewing its objectives, GFI Composites shall take into account any legal requirements of the provincial Occupational Health and Safety Act and regulations, as well as any safety risks to which workers of GFI Composites are exposed in the course of their work on behalf of GFI Composites.

GFI Composites health and safety objectives shall be developed in consultation with the GFI Composites worker health and safety designate and shall be reviewed at regular intervals to determine the status of meeting our objectives. A key aspect of our health and safety program shall be on the continual improvement of our program, procedures and policies.

**Reference: GFI-HSE-FM-013 - Annual Health and Safety Objectives**

### **3.0 Worker Health and Safety Designate**

The role of the GFI Composites worker health and safety designate will be to monitor the health, safety and welfare of workers at the workplace and act as a liaison with GFI Composites management on these matters. The GFI Composites worker health and safety designate will be appointed and shall participate in mandatory training delivered by a certified trainer approved by the Workplace Health, Safety and Compensation Commission.

The worker health and safety designate shall be consulted on matters regarding workplace health and safety. They will represent any concerns of the workers to the management of GFI Composites and shall work together with both GFI Composites management and workers to develop solutions to the issues that satisfy both parties. In addition,

- GFI Composites shall identify the worker health and safety designate and his/her role in the GFI Composites safety system (this may be done in a tool box talk and through other appropriate means);
- The worker health and safety designate shall participate in any internal or external audit of the GFI Composites safety and health management systems, including any scheduled COR® audit; and
- The worker health and safety designate shall participate in regularly scheduled safety inspections by conducting inspections with site workers or supervisors and by reviewing completed inspection forms to ensure thoroughness of inspections and adequacy of control measures and actions put in place.
- The name of the workplace health and safety designate shall be posted in a location which is easily accessible and visible to all GFI Composites workers.

## 4.0 Safety Program and Management System

The GFI Composites health and safety program consists of a series of this manual and a series of policies and procedures that guide the implementation and execution of the GFI Composites approach to workplace health and safety management.

The GFI Composites health and safety program consists of the appropriate number of elements deemed necessary to meet those identified requirements as reflected in our commitment to meeting our health and safety responsibilities.

A written hard-copy version of the GFI Composites Health and Safety Program Manual is kept at the worksite and at the company office where it can be made available, upon request to any employee.

An electronic copy of the GFI Composites Health and Safety Program Manual is also available, and all workers are granted access to a computer and access to the files when requested.

### 4.1 Safety Audits

Accident frequency and severity rates alone are inadequate measures of safety performance and for evaluating the effectiveness of our health and safety program. For example, cases of occupational disease are under-reported in these statistics and the emphasis is usually on injury-producing accidents alone, not all accidents. Furthermore, since accidents are rare events, in small organizations the basis for comparison may be limited. Chance is also a factor both in frequency and severity.

Rather than relying solely on injury rates, or after-the-event measures, GFI Composites uses health and safety audits as a before-the-fact measure of the effectiveness of our health and safety program. The GFI Composites audit consists of a checklist in which each element of our health and safety program is subdivided into a series of questions. Records, observations, interviews, and questionnaires are used to evaluate performance for each GFI Composites health and safety program element.

GFI Composites has an established schedule for internal and external audits to evaluate the effectiveness of our health and safety program. Our audits are designed to ensure conformance to the requirements of the provincial Occupational Health and Safety Act and regulations, our health and safety program and to maintain COR® status as required by the Newfoundland and Labrador Construction Safety Association. The audit procedure guides the audit process and includes provision for follow-up on deficiencies and action management, and the establishment of target dates for remedial action and checks to confirm completion.

The audit team, which includes the health and safety designate, receives appropriate training in auditing procedures and practices.

**Reference: GFI-HSE-PR-008, Safety Audit Policy**

## 5.0 Hazard Recognition, Evaluation and Control

GFI Composites uses a systematic approach to hazard recognition, evaluation and control. The foundation of this risk management approach is the Risk Assessment process, whereby risks are systematically identified, ranged in terms of their potential for loss, and appropriately controlled through a series of risk mitigation measures. The main tool for this process is the job risk analysis (JRA) process.

### 5.1 Four Basic Steps of Conducting a JRA (Job Risk Analysis)

The four basic stages in conducting a Job Risk Analysis at GFI Composites are:

- 1) selecting the job to be analyzed;
- 2) breaking the job down into a sequence of steps;
- 3) identifying potential hazards; and
- 4) determining preventive measures to overcome these hazards.

#### 5.1.1 Selecting the Job

All jobs will be subjected to risk analysis. However, in some cases, there are practical constraints posed by the amount of time and effort required to do a JRA. Another consideration is that each JRA will require revision whenever equipment, raw materials, processes, or the environment change. For these reasons, it is important to identify which jobs are to be analyzed through the formal JRA process, ensuring that the most critical jobs are examined first.

Factors to be considered in setting a priority for analysis of jobs include:

- Accident frequency and severity: jobs where accidents occur frequently or where they occur infrequently but result in disabling injuries;
- Potential for severe injuries or illnesses: the consequences of an accident, hazardous condition, or exposure to harmful substance are potentially severe;
- Newly established jobs: due to lack of experience in these jobs, hazards may not be evident or anticipated;
- Modified jobs: new hazards may be associated with changes in job procedures; and
- Infrequently performed jobs: workers may be at greater risk when undertaking non-routine jobs and a JRA provides a means of reviewing hazards.

#### 5.1.2 Breaking the Job Down to Basic Steps

After a job has been chosen for analysis, the next stage is to break the job into steps. A job step is defined as a segment of the operation necessary to advance the work.

Care must be taken not to make the steps too general, thereby missing specific steps and their associated hazards. On the other hand, if they are too detailed, there will be too many steps. A rule of thumb which GFI Composites shall use is that most jobs can be described in less than ten

(10) steps. If more steps are required, GFI Composites will consider dividing the job into two segments, each with its separate JRA, or combining steps, where appropriate.

GFI Composites shall ensure that we keep the steps in their correct sequence to ensure a logical flow of the job and the risk management actions required. Any step which is out of order may miss serious potential hazards or introduce hazards which do not actually exist.

GFI Composites will ensure that when completing a JRA that we record each step in sequence. We will make notes about what is done rather than how it is done. We will start each item with an action verb. This part of the analysis is usually done by knowing or watching a worker do the job.

The JRA is not a time and motion study in disguise or an attempt to uncover individual unsafe acts. The job, not the individual, is being studied in an effort to make it safer by identifying hazards and making modifications to eliminate or reduce them. The worker's experience contributes in making job and safety improvements.

When completed, GFI Composites will discuss the breakdown of steps with all the job participants to make sure that all basic steps have been noted and are in the correct order.

### **5.1.3 Identifying Potential Hazards**

Once the basic steps have been recorded, GFI Composites will ensure that we identify the potential hazards at each step. Based on observations of the job, knowledge of accident and injury causes, and personal experience, we will list the things that could go wrong at each step.

To help identify potential hazards, GFI will train staff to use questions such as these (this is not a complete list):

- Can any body part get caught in or between objects?
- Do tools, machines, or equipment present any hazards?
- Can the worker make harmful contact with moving objects?
- Can the worker slip, trip, or fall?
- Can the worker suffer strain from lifting, pushing, or pulling?
- Is the worker exposed to extreme heat or cold?
- Is excessive noise or vibration a problem?
- Is there a danger from falling objects?
- Is lighting a problem?
- Can weather conditions affect safety?
- Is harmful radiation a possibility?
- Can contact be made with hot, toxic, or caustic substances?
- Are there dusts, fumes, mists, or vapors in the air?

#### 5.1.4 Determining Preventive Measures

The final stage in a JRA is to determine ways to eliminate or control the hazards identified. The generally accepted measures, in order of preference in the hierarchy of controls, are:

##### 5.1.4.1 Eliminate the Hazard

This is the most effective measure. These techniques should be used to eliminate the hazards:

- Choose a different process;
- Modify an existing process;
- Substitute with less hazardous substance;
- Improve environment (ventilation);
- Modify or change equipment or tools.

##### 5.1.4.2 Contain the Hazard

If the hazard cannot be eliminated, contact might be prevented by using enclosures, machine guards, worker booths or similar devices.

##### 5.1.4.3 Revise Work Procedures

Consider modifying steps which are hazardous, changing the sequence of steps, or adding additional steps (such as locking out energy sources).

##### 5.1.4.4 Reduce the Exposure

These measures are the least effective and should only be used if no other solutions are possible. One way of minimizing exposure is to reduce the number of times the hazard is encountered. An example would be modifying machinery so that less maintenance is necessary. The use of appropriate personal protective equipment may be required. To reduce the severity of an accident, emergency facilities, such as eyewash stations, may need to be provided.

In listing the preventive measures, GFI Composites will not use general statements such as "be careful" or "use caution". Specific statements which describe both what action is to be taken and how it is to be performed are preferable.

**Reference: GFI-HSE-FM-001, Job Risk Assessment Form**  
**Reference GFF-HSE-FM-002, Job Risk Assessment Matrix**

## 6.0 Workplace Safety Inspections

GFI Composites ensures that regular inspections of all buildings, structures, machinery, equipment, work practices and places of employment are carried out by GFI Composites management and/or the health and safety designate, or other designated representative. Workplace safety inspections are conducted at defined intervals to ensure that safe working conditions are maintained and that unsafe practices or conditions found as a result of the inspection are remedied without delay.

Where an unsafe practice or condition is identified, it is to be reported as soon as practicable to a supervisor who ensures that appropriate action is taken, without delay, to prevent a GFI Composites worker from being injured.

Where emergency action is required to correct a condition that constitutes an immediate threat to GFI Composites workers, only those qualified and properly instructed GFI Composites workers necessary to correct the unsafe condition shall be exposed to the hazard and every possible effort shall be made to control the hazard while the corrective action is taking place.

In addition to the day-to-day informal process of having all GFI Composites staff looking for risk and hazards associated with the workplace, GFI Composites ensures that a weekly inspection is conducted at the workplace to identify any risks or hazards. If any risks or hazards are identified during the weekly inspection process, actions will be initiated to determine a specific time line to correct those risks or hazards.

### 6.1 Purpose of Workplace Inspections

Workplace inspections help prevent injuries and illnesses. Through critical examination of the workplace, inspections identify and record hazards for corrective action. Regular workplace inspections are an important part of the GFI Composites overall occupational health and safety program.

Workplace inspections allow GFI Composites to:

- listen to the concerns of workers and supervisors;
- gain further understanding of jobs and tasks;
- identify existing and potential hazards;
- determine underlying causes of hazards;
- monitor hazard controls (personal protective equipment, engineering controls, policies, procedures);
- recommend corrective action.

### 6.2 Common Workplace Hazards

Types of common workplace hazards which all staff will be asked to look for at the GFI Composites facilities include:

- Safety hazards; e.g., inadequate machine guards, unsafe workplace conditions, unsafe work practices;

- Biological hazards caused by organisms such as viruses, bacteria, fungi and parasites;
- Chemical hazards caused by a solid, liquid, vapor, gas, dust, fume or mist;
- Ergonomic hazards caused by anatomical, physiological, and psychological demands on the worker, such as repetitive and forceful movements, vibration, temperature extremes, and awkward postures arising from improper work methods and improperly designed workstations, tools, and equipment;
- Physical hazards caused by noise, vibration, energy, weather, heat, cold, electricity, radiation and pressure.

### **6.3 Inspection Checklists**

GFI Composites utilizes a structured checklist to help clarify inspection responsibilities, control inspection activities and provide a report of inspection activities. Checklists permit easy on-the-spot recording of findings and comments.

Specific and general workplace inspection checklists shall be developed and used as required.

**Reference: GFI-HSE-POL-004, Inspection Policy**

**Reference: GFI-HSE-FM-010, General Worksite Safety Inspection Form**

**Reference: GFI-HSE-FM-009, Site Safety Inspection Form**



## 7.0 Incident Investigation

GFI Composites establishes and maintains procedures for reporting and investigating work-related injuries, illnesses, fatalities, and OHS incidents, including near misses.

The investigation of cause(s) of work-related injuries, illnesses, and OHS incidents is intended to identify any opportunities for improvement in the GFI Composites health and safety management program. Such investigations are documented and are carried out by competent persons trained in incident investigation, with the participation of the appropriate workplace parties.

Where appropriate, recommendations will be developed and, along with the investigation's results, will be communicated to the GFI Composites staff.

GFI Composites is committed to the prevention of all work related incidents and occupational injuries. In the event that our health and safety program does not function as designed and workers experience a work related injury or illness, GFI Composites will work to identify the facts which contributed to the incident or illness, and develop strategic measures to ensure the elimination of any recurrence, as well as improvements to the GFI Composites health and safety program.

GFI Composites will ensure we communicate to all workers the steps to be taken in the event of a work related injury or illness. These steps include, but will not be limited to:

- Identifying a designated person(s) to whom an injury(ies) will be reported;
- Ensuring that there is a provision to transport a worker to appropriate medical care (as per section 87 of the Workplace Health, Safety and Compensation Act);
- Ensuring the submission of the appropriate forms to the Workplace Health, Safety and Compensation Commission;
- Ensuring that the injured worker returns to GFI Composites a copy of the Physician's Report of Injury or Chiropractor's Report of Injury.

GFI Composites will ensure that there is an effective and understood internal process which can demonstrate that the WHSCC forms are available either in paper copy or online access. These forms include:

- WHSCC Form 6 – Worker's Report of Injury;
- WHSCC Form - 7 Employer's Report of Injury;
- WHSCC Early and Safe Return to Work Plan Form or an alternate form acceptable to the WHSCC.

## **7.1 Initial Response to an Incident**

The first priority following any incident involving a GFI Composites employee, or any other individual on GFI Composites property, must be the health and safety of all persons involved. The response will depend on the incident and the resources readily available, and may include the administration of:

- Casualty Care & First Aid;
- Activate emergency response services (ambulance, fire, etc.). Additional assistance may be sought as required;
- Evacuation and facility integrity / security.

### **7.1.1 Securing the Incident Site**

The designated GFI Composites person in charge will ensure the site of the incident has been appropriately secured. This is to protect personnel from any further injury and to protect any evidence that may be needed for an investigation.

Note: In the event of a fatality or serious injury, permission from the regulatory or law enforcement authority may be required before the site can be disturbed.

## **7.2 Incident Investigation Process**

The individual designated by GFI Composites as the lead investigator is responsible to plan and schedule the investigation.

The investigation shall start with an opening meeting between the investigator and the people involved in the incident. During the meeting, the investigation and schedule are discussed.

The investigator shall collect evidence and information on the incident through the application of any or all of the following information gathering, techniques:

- Conduct a scene survey and/or recreation of the incident;
- Conduct interviews with witnesses and/or relevant personnel;
- Taking measurements, samples or photographs; and
- Review of documents, drawings etc.

The investigator shall complete a written report that, as a minimum, includes the event description, identification of cause and corrective actions.

Note: It is important that the investigation goes beyond identifying the obvious immediate causes and determines the root cause.

**Reference: GFI-HSE-POL-006, Incident Investigation Policy**

**Reference: GFI-HSE-FM-003, Incident Investigation Form**

## **7.3 Incident Reporting**

### **7.3.1 Internal Reporting**

Internal reporting refers to the immediate notification of an incident to GFI Composites management. The initial report of an incident may be communicated verbally to GFI Composites management within 24 hours. In addition, the GFI Composites senior management must be notified to ensure compliance with external notification requirements (i.e.; WHSCC) and assist with the determination of the level of investigation that may be required.

### **7.3.2 External Reporting**

#### **7.3.2.1 Workplace Health, Safety and Compensation Commission**

Within 3 days (72 hours) of a Lost Time Injury, Restricted Work Case or Medical Aid, a designated GFI Composites representative must submit a report to the Newfoundland & Labrador Workplace Health & Safety Compensation Commission (WHSCC).

#### **7.3.2.2 Department of Government Services, Occupational Health and Safety Branch**

Any Serious Injury is to be reported by a senior management representative of GFI Composites by telephone to the Department of Government Services, Occupational Health & Safety Branch. The verbal report will be followed up with a copy of the Incident Investigation Report.

Under the provincial Occupational Health and Safety regulations, "serious injury" is defined as an injury that

- (a) places life in jeopardy;
- (b) produces unconsciousness;
- (c) results in substantial loss of blood;
- (d) involves the fracture of a leg or arm but not a finger or toe;
- (e) involves the amputation of a leg, arm, hand, foot, finger or toe;
- (f) consists of burns to a major portion of the body; or
- (g) causes the loss of sight in an eye.

## 8.0 Safe Work Practices and Procedures

GFI Composites shall ensure that there are practical and appropriate safe work practices and procedures to address the risks which workers may find themselves exposed to associated with their work tasks. GFI Composites shall utilize a Safe Work Practice form which shall be used to document the critical safe work practices associated with select tasks which have been identified as requiring a risk management/reduction strategy (See Sections 10 and 11).

### 8.1 Workplace Specific Rules and Procedures

The following equipment shall have a specific procedure developed to ensure the safe use of these processes:

#### Safe Work Practice Form

Work Task: \_\_\_\_\_

**GFI Composites**

No.	Safe Work Practice	YES	NO
1.	Chop Gun		
2.	Forklift		
3.	Grinder		
4.	Fiberglass Chopper		
5.	Table Saw		
6.	Compressed Air		
7.	Lock Out-Tag Out		
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			

In addition, the following safe work practices shall be observed by all GFI Composites staff.

## 8.2 Defective Tools

### General

Defective tools can cause serious and painful injuries. If a tool is defective in any way, **it shall not be used.**

It is important that all GFI Composites staff is aware of the following potential tool problems, such as:

- chisels and wedges with mushroomed heads
- split or cracked handles
- chipped or broken drill bits
- wenchers with worn out jaws
- tools which are not complete, such as files without handles

To ensure safe use of hand tools, GFI Composites staff shall observe the following:

- never use a defective tool;
- double check all tools prior to use; and
- ensure defective tools are reported so that they can be repaired

Air, gasoline or electric power tools, require skill and complete attention on the part of the user even when they are in good condition. Don't use power tools when they are defective in any way.

Always watch for tool problems like:

- broken or inoperative tool guards,
- insufficient, improper or defective grounding due to damage on double insulated tools,
- no ground wire (on plug) of cords of standard tools,
- on/off switches not in good working order,
- tool blades cracked,
- the wrong grinder wheel is being used, or
- guard has been wedged back on a power saw or any other machinery on which a guard is required.

## 8.3 Fire and use of Fire Extinguishers

### 8.3.1 General

Good Housekeeping is an essential component in the prevention of fires. Fires can start anywhere and at any time. That is why it is extremely important to know which fire extinguisher to use and how to use it.

It is important to always keep fire extinguishers visible, clearly identified and easy to access. Fire extinguishers have to be properly maintained in order to perform as they have been designed.

### 8.3.2 Types of Fires:

There are several types of fires which need to be understood in order to select the most appropriate extinguisher. The following classes of fire/appropriate fire extinguisher shall be referenced by GFI Composites as part of our fire prevention strategy:

- **Class A:** Class A fires consist of materials such as wood, paper, rags, rubbish and other ordinary combustible materials.

**Recommended Extinguisher for a Class A Fire**

Water from a hose, pump type water can, or pressurized extinguisher, and soda acid extinguishers.

**Fighting the Fire**

Soak the fire completely-even the smoking embers.

- **Class B:** Class B fires consist of flammable liquids, such as oil and grease

**Recommended Extinguisher for a Class B fire**

ABC units, dry chemical, foam and carbon dioxide extinguishers.

**Fighting the Fire**

Start at the base of the fire and use a swinging motion from the left to right, always keeping the fire in front of you.

- **Class C:** Class C Fires involve electrical equipment

**Recommended Extinguisher for a Class C fire**

Carbon dioxide and multiple dry chemical (ABC type) extinguishers.

**Fighting the Fire**

Use short bursts on the fire. When the electrical current is shut off on a Class C fire, it can become a Class A fire if the materials around the electrical fire are ignited.

## 9.0 Education, Training and Communications (including Orientation)

GFI Composites shall ensure that all staff has the knowledge and skills to perform their assigned job tasks in a safe and productive manner.

Health and safety education shall start with employee orientation when an employee joins GFI Composites or is transferred to a new job. It has been found that inexperienced workers, in general, are involved in incidents at a higher rate than others. While experience can only be gained through time, both health and safety education and job skills training can be used to improve this record. Orientation sessions will cover such items as the function of the work unit, organizational relationships, administrative arrangements, and miscellaneous policies and rules.

Items related to health and safety that will be included in the GFI Composites orientation are:

- GFI Composites emergency procedures and phone numbers
- location of first aid stations
- health and safety responsibilities, including those specified by legislation
- reporting of injuries, unsafe conditions and practices
- use of personal protective equipment
- right to refuse unsafe work
- hazards, including those outside own work area
- reasons for each health and safety rule

Key questions which GFI Composites will be prepared to address as part of any new employee orientation session will include:

- What are the hazards of the job?
- Is job safety training available?
- What safety equipment do I need to do my job?
- Do I need to wear personal protective equipment (PPE)? Will I receive training on how to use the PPE?
- What do I do in case of fire or another emergency?
- Where do I find fire extinguishers, first aid kits, first aid rooms and emergency assistance?
- What are my responsibilities regarding health and safety?
- If I notice something wrong, to whom should I report?
- Who is responsible for answering safety-related questions?
- What do I do if I get injured or have an accident?

### 9.1 Orientations

GFI Composites shall ensure that all new staff receives orientation to the GFI Composites safety policies and procedures. The following orientation checklist shall be used to document the orientation given and shall serve as a record of the orientation.

EMPLOYEE ORIENTATION CHECKLIST		
Areas to be Covered	Description	Completed
		Yes

GFI Composites Safety Rules	Explain safety rules that are specific to your company.		
GFI Composites Policies	Explain the health, safety and wellness policies of your company.		
Previous Training	Ask the employee if she/he has taken any safety training.		
Training	Provide any necessary safety, environmental, compliance or policy/procedural training.		
Health and Safety	Inform the health and safety specialist that a new employee has joined the company who may need safety training. Arrange for this training and education to occur.		
Potential hazards	Tour your work areas and facility and discuss associated work area hazards and safe work practices.		
Emergency Procedures	Show and explain how to use emergency eyewashes and showers, first aid kits, fire blankets, fire extinguishers, fire exits and fire alarm pull boxes, as applicable. Demonstrate the evacuation procedures.		
Toxic Products	Identify workspaces where hazardous materials are used, stored or disposed. Provide training as necessary.		
Food and Beverages	Explain that food and beverages are only permitted to be stored in refrigerators clearly labeled "FOOD ONLY".		
Emergency Notification Form	Have employee complete the Emergency Notification form. Keep a copy for your files and send a copy to your Emergency Coordinator.		
WHMIS	Identify the location of the Material Safety Data Sheets (MSDSs). Review the MSDSs for all hazardous materials to be used by the employee. Explain hazardous material labeling requirements. Conduct job specific training.		
Emergency Evacuation	Review the company's Emergency Evacuation Plan and explain the evacuation signals and procedures, point out proper exit routes and the designated assembly area for your Branch.		
Personal Protective Equipment (PPE)	Review the PPE program if the employee will be required to wear protective equipment. Issue appropriate personal protective equipment (PPE) that must be worn as required by the work being performed.		
In Case of Injury or Illness	Review the reporting procedures in the event of an injury and/or accident.		
Health and Safety Designate	Supply a copy of the facility telephone list with names of health and safety designate highlighted. Identify the location of the safety bulletin board. Explain how the employee can participate in the health and safety process (e.g., report hazards)		
General Rights and Responsibilities	Explain worker rights and responsibilities as granted by legislation. ( <a href="#">click here for details</a> )		



Emergency Contact	Provide a list of names, addresses, phone numbers and fax numbers of the persons who must be contacted in case of emergency.		
Document	Maintain a record of the orientation.		
Early and Safe Return to Work	Profile early and safe return to work and duties to cooperate		
Environmental Policy	Profile the environmental policy		
Harassment Policy	Profile the harassment policy		

## 9.2 Training Focus

GFI Composites shall ensure that all employees will be competent on the basis of appropriate education, training or experience, and we shall retain appropriate records of employee training. Training shall be identified and delivered on the basis on any regulatory requirements as well as job specific requirements.

## 9.3 Tool Box Talks

Tool box talks are designed to provide an opportunity for the exchange of information deemed important for safety at the GFI Composites work site. Their main purpose is to provide a way through which GFI Composites management can inform staff of important safety issues, including safety training to improve general safety on site or updates on recent incidents. They can be conducted on an ongoing basis (for example, daily or weekly) or as needed when important safety or risk management issues arise. Tool Box meetings are an essential part of site safety management for GFI Composites.

GFI Composites shall:

- 1.** Inform site staff of the upcoming Tool Box meeting. Supervisory staff will ensure that their staff is aware of the talk and will be in attendance.
- 2.** Compile a list of topics for discussion. We will research safety training updates from industry sources, and consult the worker health and safety designate or safety log for details of any recent incidents. GFI Composites will ensure that our tool box talk material is relevant to our current activities on site.
- 3.** We will ensure that we conduct the talk in an informal but orderly manner. We will address each issue clearly and succinctly without rushing through important information.

4. We will invite the attendees to provide feedback or questions for discussion. This is an opportunity to obtain input from site staff. GFI Composites will take notes and follow up on any issues raised at the next Tool Box meeting, if not sooner.

5. As a general rule, Tool Box talks should never exceed 15 minutes; however, if the issues are important enough, this 15 minute guideline should be considered just that – a guideline.

**Reference: GFI-HSE-FM-005, Employee Orientation Form**

**Reference: GFI-HSE-POL-005, Safety Training Policy**

**Reference: GFI-HSE-FM-011, Tool Box Talk Form**

## 10.0 WHMIS

WHMIS is short for Workplace Hazardous Materials Information System. It is a comprehensive plan for providing information on the safe use of hazardous materials used in all Canadian workplaces.

The main components of WHMIS are hazard identification and product classification, labeling, material safety data sheets, and worker training and education.

### 10.1 GFI Composites Responsibilities for WHMIS:

GFI Composites shall establish education and training programs for workers exposed to hazardous products in the workplace. We will also make sure that the products are labeled and that an MSDS (Material Safety Data Sheet) is present for each product and that they are readily available to all GFI Composites workers.

### 10.2 Workers:

Workers are required to participate in the training programs and to use this information to help them work safely with hazardous materials. They may also inform GFI Composites when labels on containers have been accidentally removed or if the label is no longer readable.

### 10.3 WHMIS classifications

WHMIS uses classifications to group chemicals with similar properties or hazards. The Controlled Products Regulations specifies the criteria used to place materials within each classification. There are six (6) classes although several classes have divisions or subdivisions. Each class has a specific symbol to help people identify the hazard quickly. The classes are:

- **Class A - Compressed Gas**
- **Class B - Flammable and Combustible Material**
  - Division 1: Flammable Gas
  - Division 2: Flammable Liquid
  - Division 3: Combustible Liquid
  - Division 4: Flammable Solid
  - Division 5: Flammable Aerosol
  - Division 6: Reactive Flammable Material
- **Class C - Oxidizing Material**
- **Class D - Poisonous and Infectious Material**
  - Division 1: Materials causing immediate and serious toxic effects
    - Subdivision A: Very toxic material
    - Subdivision B: Toxic material
  - Division 2: Materials causing other toxic effects
    - Subdivision A: Very toxic material
    - Subdivision B: Toxic material
  - Division 3: Bio hazardous Infection Material
- **Class E - Corrosive material**
- **Class F - Dangerously reactive material**

**Class A - Compressed Gas?**

Any material that is normally a gas which is placed under pressure or chilled, and contained by a cylinder is considered to be a compressed gas. These materials are dangerous because they are under pressure. If the cylinder is broken, the container can 'rocket' or 'torpedo' at great speeds and this is a danger to anyone standing too close. If the cylinder is heated (by fire or rise in temperature), the gas may try to expand and the cylinder will explode. Leaking cylinders are also a danger because the gas that comes out is very cold and it may cause frostbite if it touches your skin (for example: carbon dioxide or propane). Common examples include: compressed air, carbon dioxide, propane, oxygen, ethylene oxide, and welding gases. The hazard symbol is a picture of a cylinder or container of compressed gas surrounded by a circle.

Additional dangers may be present if the gas has other hazardous properties. For example: propane is both a compressed gas and it will burn easily. Propane would have two hazard symbols - the one for a compressed gas and another to show that it is a flammable material.

**Class B - Flammable and Combustible Material?**

Flammable means that the material will burn or catch on fire easily at normal temperatures (below 37.8 degrees C or 100 deg F). Combustible materials must usually be heated before they will catch on fire at temperatures above normal (between 37.8 and 93.3 deg C or 100 and 200 deg F). Reactive flammable materials are those which may suddenly start burning when it touches air or water, or may react with air or water to make a flammable gas. The material may be a solid, liquid or gas which makes up the different divisions that fall under this class. Common examples include: propane, butane, acetylene, ethanol, acetone, turpentine, toluene, kerosene, Stoddard solvent, spray paints and varnish. The symbol for this class is a flame with a line under it inside a circle.

**Class C - Oxidizing Materials?**

Oxygen is necessary for a fire to occur. Some chemicals can cause other materials to burn by supplying oxygen. Oxidizers do not usually burn themselves but they will either help the fire by providing more oxygen or they may cause materials that normally do not burn to suddenly catch on fire (spontaneous combustion). In some cases, a spark or flame (source of ignition) is not necessary for the material to catch on fire but only the presence of an oxidizer. Oxidizers can also be in the form of gases (oxygen, ozone), liquids (nitric acid, perchloric acid solutions) and solids (potassium permanganate, sodium chlorite). Some oxidizers such as the organic peroxide family are extremely hazardous because they will

burn (they are combustible) as well as they have the ability to provide oxygen for the fire. They can have strong reactions which can result in an explosion. The symbol for oxidizing materials is an "O" with flames on top of it inside a circle.

### **Class D - Poisonous and Infectious materials?**

Class D materials are those which can cause harm to your body. They are divided into three major divisions.



**Division 1: Materials Causing Immediate and Serious Toxic Effects.** These are materials that are very poisonous and immediately dangerous to life and health. Serious health effects such as burns, loss of consciousness, coma or death within just minutes or hours after exposure are grouped in this category. Most D-1 materials will also cause longer term effects as well (those effects that are not noticed for months or years). Examples of some D-1 materials include carbon monoxide, sodium cyanide, sulphuric acid, toluene-2,4-diisocyanate (TDI), and acrylonitrile. The symbol for Class D - Division 1 (D-1) is a skull and crossed bones inside a circle.



### **Division 2: Materials Causing Other Toxic Effects**

These materials are poisonous as well. Their effects are not always quick, or if the effects are immediate but they are only temporary. The materials that do not have immediate effects, however, may still have very serious consequences such as cancer, allergies, reproductive problems or harm to the baby, changes to your genes, or irritation / sensitization which have resulted from small exposures over a long period of time (chronic effects).

Division 2 of Class D has two subclasses called D2A (very toxic) and D2B (toxic). While it is not a legal requirement for the WHMIS sub-classification to be reported on the Material Safety Data Sheet (MSDS) nor is it a requirement for classes D2A or D2B to be distinguished on the label, it is often possible to make this distinction using the health hazard information on the label and/or the MSDS.

Products are typically classified as D2A (very toxic) if the chemical has been shown to be carcinogenic, embryo toxic, teratogenic, mutagenic (to reproductive cells), reproductive toxic, sensitizer (to respiratory tract) or chronic (long-term) toxicity (at low doses). Subdivision D2B (toxic) covers mutagenic (to non-reproductive cells), sensitization of the skin, skin or eye irritation, as well as chronic toxic effects.

Examples include: asbestos fibres, mercury, acetone, benzene, quartz silica (crystalline), lead and cadmium. The symbol for materials causing other toxic effects looks like a "T" with an exclamation point "!" at the bottom inside a circle.



### **Division 3: Biohazardous Infectious Materials**

These materials are organisms or the toxins they produce that can cause diseases in people or animals. Included in this division are bacteria, viruses, fungi and parasites. Because these organisms can live in body tissues or fluids (blood, urine), the tissues and fluids are also treated as toxic. Biohazardous infectious materials are usually found in a hospital, health care facility, laboratories, veterinary practices and research facilities. Workers in these places do not usually know which tissues or fluids contain dangerous organisms. For this reason, the workers assume that every sample is dangerous and proper protection is used all the time. Examples of biohazardous infectious materials include the AIDS/HIV virus, Hepatitis B and salmonella. The symbol for this division looks like three "c"s joined together with a little circle in the middle all inside a circle.

### **Class E - Corrosive Material?**



Corrosive is the name given to materials that can cause severe burns to skin and other human tissues such as the eye or lung, and can attack clothes and other materials including metal. Corrosives are grouped in this special class because their effects are permanent (irritants whose effects may be similar but temporary are grouped in Class D-2). Common corrosives include acids such as sulphuric and nitric acids, bases such as ammonium hydroxide and caustic soda and other materials such as ammonia gas, chlorine, and nitrogen dioxide. The symbol for a corrosive is a picture of two test tubes pouring liquid on a bar (piece of metal) and a hand with lines coming off of them inside a circle.

### **Class F - Dangerously Reactive Materials?**



A material is considered to be dangerously reactive if it shows three different properties or abilities: first, if it can react very strongly and quickly (called "vigorously") with water to make a toxic gas; second, if it will react with itself when it gets shocked (bumped or dropped) or if the temperature or pressure increases; and thirdly, if it can vigorously join to itself (polymerization), break down (decomposition) or lose extra water such that it is a more dense material (condensation). If a material is dangerously reactive, it will most likely be described as "unstable". Most of these materials can be extremely hazardous if they are not handled properly because they can react in such a quick manner very easily. Examples of these products are ethyl acrylate, vinyl chloride, ethylene oxide, picric acid and anhydrous aluminum chloride. The symbol for dangerously reactive materials is a picture of a test tube with sparks or lines coming out of the tube surrounded by a letter "R" inside a circle.

## **10.4 WHMIS education and training**

Education and training under WHMIS (Workplace Hazardous Materials Information System) can be thought of as two separate parts. Education refers to the instruction of workers in general information such as how WHMIS works and the hazards of controlled products. Training refers to the instruction in site-specific information such as work and emergency procedures. Both education and training are an important part of understanding the hazards that may be present at your workplace.

GFI Composites shall develop, implement, and maintain a worker education program that will enable

workers to work safely with hazardous chemicals. Instruction on requirements for labels and data sheets, information on how product may affect the workers health or safety as well as training in safe work procedures are necessary.

### **10.5 MSDS (Material Safety Data Sheet)**

GFI Composites shall ensure that for every material that GFI Composites workers use that is controlled by that we will have an accompanying MSDS that is specific to the individual product or material (both the product name and supplier on the MSDS must match the material in use).

### **10.6 Updating MSDS**

GFI Composites shall ensure that an MSDS for a controlled product shall not be more than three years old. If new, significant information becomes available before the three years has elapsed, GFI Composites shall ensure that the supplier is provides an update the product label and MSDS.

GFI Composites shall ensure that all controlled products have an up-to-date (less than three years old) MSDS when it enters the workplace. The MSDSs shall be readily available to the workers who are exposed to the controlled product and to the health and safety representative. If a controlled product is made in the workplace, the GFI Composites has a duty to prepare an MSDS for any of these products.

GFI Composites will also ensure that the safe handling aspects of any material safety data sheet used in our workplace is communicated to relevant GFI Composites staff. We will use tool box talks to help communicate the MSDS requirements for safe product use.

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## 11.0 Company Rules and Procedures

GFI Composites shall ensure that any rules drafted or written shall first be shared with the worker health and safety designate and all affected employees to ensure an understanding of the rationale and expectation for the rule. Discussion of any general or specific rules or procedures shall be the topic of discussion for safety meetings and tool box talks.

GFI Composites rules and procedures shall be clearly defined. General safety rules shall apply to all GFI Composites staff in any and all work related situations. The following constitute the general safety rules for all GFI Composites staff:

### 11.1 GENERAL RULES

- Consuming or being in possession of alcohol or illegal drugs on GFI Composites premises, or on any GFI Composites or customer job-site, is strictly prohibited and will be cause for appropriate disciplinary action.
- Fighting, threats of violence, horseplay, practical jokes or harassment of another worker is prohibited.
- Theft, vandalism or any other abuse or misuse of GFI Composites or customer property is prohibited.
- All at risk practices or behaviors or conditions, including "near miss" incidents, are to be reported to an appropriate GFI Composites supervisor promptly.
- All incidents which result in damage or injury are to be reported to an appropriate GFI Composites supervisor immediately.
- First aid treatment is to be obtained promptly for any injury requiring first aid. Medical aid injuries shall require immediate medical attention as appropriate.
- CSA approved hard hats, safety footwear and safety glasses are to be worn at all times on all job sites where the risk of head, foot or eye injury exists. Other personal protective equipment (PPE) shall be worn as appropriate, and based on the exposure to the risk in question.
- All work shall be carried out in accordance with appropriate safe work practices and your supervisor's direction.
- Only those tools that are in good repair, with all guards and safety devices in place, shall be used.
- Every worker shall keep his/her work area neat, clean and orderly.

Other general and specific safety rules will be prepared and communicated for use by GFI Composites staff as required.

**Reference: GFI-HSE-POL-009, Disciplinary Policy**



## 11.2 Maintenance

GFI Composites shall ensure that we will have a documented maintenance policy which will guide our efforts on any tool or equipment for which maintenance is required.

Proper maintenance, in combination with an effective inspection program can greatly reduce the hazards to workers from defective tools and equipment. A preventive maintenance program for all GFI Composites equipment also helps us to predict when equipment will be out of out of service thus avoiding potential interruptions to operations.

In order to ensure that proper maintenance is carried out, GFI Composites has set a maintenance schedule for all equipment. GFI Composites also conducts regular maintenance inspections of the entire inventory of tools to determine maintenance requirements. Records of maintenance conducted and maintenance inspections and pre-use inspections will be kept on file for verification during any internal or external safety audit.

GFI Composites shall also ensure that we remove and defective or unsafe tools and equipment from service so that others can not use it before it has been serviced. Tools requiring maintenance or repair shall be tagged or placed in a designated area tool repair area).

**Reference: GFI-HSE-POL-002, Maintenance Program Policy**  
**Reference: GFI-HSE-FM-004, Maintenance Record Form**

## 12.0 Emergency Management and Preparedness

In conformance with the provincial Occupational Health and Safety Regulations, GFI Composites shall ensure that, where appropriate, and emergency plan risk assessment shall be carried out, based on the workplace and risks associated with that workplace or where there is a need to rescue or evacuate workers.

For any risk assessment which identified a need for evacuation or rescue, GFI Composites shall ensure an appropriate written procedure shall be developed and implemented and a worker assigned to coordinate their implementation.

If there are designated areas of GFI Composites which, after any risk assessment is deemed to be low risk in the opinion of GFI Composites, GFI Composites shall post information about escape routes, up-to-date floor plans and we shall conduct emergency response/evacuation drills as appropriate.

### 12.1 Emergency exits and drills

GFI Composites shall ensure that emergency exit routes shall be provided from any work area in which the malfunctioning of equipment or a work process could create an immediate danger to a worker and if the regular means of exit could become dangerous or unusable. The following emergency response requirements shall be implemented:

- An emergency exit route plan shall be designed and posted to provide quick, efficient and unimpeded exit.
- At least once a year an emergency drill shall be held to ensure awareness and effectiveness of the emergency exit routes and procedure. A record of any emergency drills conducted shall be kept for a period of 5 years.

### 12.2 Emergency Contact Phone Numbers

In the event of an emergency, the following emergency phone numbers shall be used to ensure emergency assistance is provided:

- Patrick Galway:
- Denis Galway:
- Workplace Health Safety and Compensation Commission: 778-1000
- Occupational Health and Safety Branch (to report a serious injury): 729-4444
- Health Sciences Center: 777-6300
- Royal Newfoundland Constabulary: 729-8000
- St. John's Regional Fire Department:
- Emergency/Ambulance: 911
- Goulds Fire Station: 758-3240
- Mount Pearl Fire Station: 576-8034
- Brookfield Fire Station: 758-3236
- Fire Prevention Division: 576-3905
- Poison Control Center: 722-1110
- Emergency Response Team: Pat Galway and Denis Galway

### **12.3 Emergency lighting**

Where a failure of a lighting system may create conditions dangerous to the health and safety of GFI Composites workers, emergency lighting shall be provided for the workplace and the designated exit routes.

An emergency lighting system shall provide dependable illumination while the primary lighting system is off to enable all emergency measures to be carried out, including:

- emergency shutdown procedures, and
- evacuation of workers from the premises.

### **12.4 First Aid and Medical Assistance**

All work sites and buildings are to have first aid kits. They shall be located in areas where workers will have easy access. All employees will be made aware of the location of all first aid kits.

All staff will be required to:

1. Report all injuries to their supervisor/foreman immediately
2. Know the location of all first aid kits
3. Report if first aid supplies need to be replenished
4. Record any usage of material from the first aid kit.

GFI Composites shall also:

- shall provide and maintain first aid supplies and services required by the provincial Occupational Health and Safety regulations and shall ensure that our first aid supplies and services are used for prompt and effective first aid.
- ensure that there is posted in a conspicuous location in the workplace a written notice which outlines our policy and procedure for the reporting of workplace injuries.

We shall ensure that we have an appropriate number of workers trained and in possession of a valid emergency first aid certificate.

The first aid facilities and materials required in our facility will meet the requirements of the provincial Occupational Health and Safety First Aid regulations.

GFI Composites shall ensure that there is posted in the vicinity of the first aid kit a workplace a notice containing

- the name of the particular person in charge of the first aid kit
- the name and qualifications of each person trained to administer first aid; and
- an emergency procedure and a telephone list or other instructions for reaching the nearest police, ambulance, fire station, hospital or physician.

First aid training shall be provided in conformance to the requirements of the Occupational Health and Safety First Aid Regulations. Where more than one but less than 15 GFI Composites workers are engaged on one shift GFI Composites will ensure that one of the workers holds a valid emergency first aid certificate.

## 13.0 Records and Statistics

GFI Composites shall ensure that the maintenance of records and statistics shall be maintained and filed for ease of access.

### 13.1 Statistics to be maintained by GFI Composites shall include:

1. Lost time incidents
2. Medical Treatment incidents
3. First aid incidents
4. Total Recordable Incident Frequency - TRIF (Lost time and medical treatment).  
*Calculation is total # of recordable incidents x 200,000 divided by the total # of exposure hours*
5. Lost Time Incident Frequency – LTIR (Lost time injuries). *Calculation is total # of recordable incidents x 200,000 divided by the total # of exposure hours*

### 13.2 Records to be Maintained by GFI Composites

- Workplace inspections
- Incident investigations
- Job Safety Analysis (Risk Assessments)
- Maintenance records
- Tool box talks or minutes/records of other safety meetings
- Safety Orientations
- Records of any formal communication with the Workplace Health, Safety and Compensation Commission or the Department of Government Services, Occupational Health and Safety Branch.
- Records of any safety audits, findings stemming from those audits and any actions resulting from the findings of those audits, as well as the status of those actions

**Reference: GFI-HSE-FM-006, Monthly Safety Statistics Form**

**Reference: GFI-HSE-FM-012, Monthly Safety Activities Summary**

## 14.0 Legislation and Compliance

GFI Composite shall ensure that there is a process to ensure compliance with the requirements of any relevant legislation and regulatory requirements of the provincial Occupational Health and Safety Act and regulations, Occupational Health and Safety First Aid regulations and WHMIS regulations, as a minimum.

GFI Composites shall ensure that there is an up-to-date hard copy of the provincial Occupational Health and Safety Act and regulations available for employee access and that all employees will be informed of its location.

Tool box talks or other employee communication opportunities shall be used to publicize the availability and location of the hard copy of the provincial Occupational Health and Safety Act and regulations.

GFI Composites shall also ensure that the three fundamental rights of all workers, as enshrined in the Canadian concept of the Internal Responsibility System for workplace health and safety, are communicated and understood by all GFI Composites workers and management.

### 14.1 Internal Responsibility System for workplace health and safety

The Internal Responsibility System puts in place an employee-employer partnership in ensuring a safe and disease free workplace. A health and safety committee is a joint forum for employers and employees working together to improve workplace health and safety.

The Internal Responsibility System is the underlying philosophy of the occupational health and safety legislation in all Canadian jurisdictions. Its foundation is that everyone in the workplace - both employees and employers - is responsible for his or her own safety and for the safety of co-workers. Acts and regulations do not always impose or prescribe the specific steps to take for compliance. Instead, it holds employers like GFI Composites responsible for determining such steps to ensure health and safety of all employees.

The Internal Responsibility System does the following:

- Establishes responsibility sharing systems for GFI Composites
- Promotes a safety culture within GFI Composites
- Promotes best safety practice within GFI Composites
- Helps GFI Composites develop self reliance on our staff, or safety policies and procedures, and our process for identifying and solving workplace safety issues
- Ensures compliance to relevant Acts and regulations, or other codes of practice or other standards

### 14.2 Basic Rights of all workers

All GFI Composites employees have the following three basic rights:

- The *right to refuse* unsafe work
- The *right to participate* in decisions which have the potential to impact their individual or collective health and safety
- The *right to know*, or the right to be informed about, actual and potential dangers in the workplace

GFI Composites will ensure all staff know and understand these basic rights respecting workplace health and safety.

### **14.3 Knowledge of regulatory requirements**

GFI Composites will also ensure that the expectations of the provincial Occupational Health and Safety Act and regulations are understood by all GFI Composites staff. We will actively undertake initiatives to understand the expectations of the Act and regulations, and shall take whatever actions necessary to ensure the requirement of the Act and regulations are integrated into our operations.

The GFI Composites HSE Manual shall be maintained current and up-to-date and all revisions will be documented and any changes appropriately communicated.

## 15.0 Physical Plant and Housekeeping

Effective housekeeping can eliminate many workplace hazards and help get a job done safely and properly. Poor housekeeping can frequently contribute to accidents by hiding hazards that cause injuries. If the sight of paper, debris, clutter and spills is accepted as normal, then other more serious health and safety hazards may be taken for granted.

Housekeeping is not just cleanliness. It includes keeping work areas neat and orderly; maintaining halls and floors free of slip and trip hazards; and removing of waste materials (e.g., paper, cardboard) and other fire hazards from work areas. It also requires paying attention to important details such as the layout of the whole workplace, aisle marking, the adequacy of storage facilities, and maintenance. Good housekeeping is also a basic part of incident and fire prevention.

Effective housekeeping is an ongoing operation: it is not a hit-and-miss cleanup done occasionally. Periodic "panic" cleanups are costly and ineffective in reducing accidents.

### 15.1 Purpose of workplace housekeeping

Poor housekeeping can be a cause of incidents, such as:

- tripping over loose objects on floors, stairs and platforms
- being hit by falling objects
- slipping on greasy, wet or dirty surfaces
- striking against projecting, poorly stacked items or misplaced material
- cutting, puncturing, or tearing the skin of hands or other parts of the body on projecting nails, wire or steel strapping

To avoid these hazards, GFI Composites shall "maintain" order throughout our workday. Although this effort requires a great deal of management and planning on the part of GFI Composites and our staff, the benefits are many.

### 15.2 Benefits of good housekeeping practices

Effective housekeeping results in:

- reduced handling to ease the flow of materials
- fewer tripping and slipping accidents in clutter-free and spill-free work areas
- decreased fire hazards
- lower worker exposures to hazardous substances (e.g. dusts, vapors, fibres)
- better control of tools and materials, including inventory and supplies
- more efficient equipment cleanup and maintenance
- better hygienic conditions
- more effective use of space
- reduced property damage by improving preventive maintenance
- less janitorial work
- improved morale
- improved productivity (tools and materials will be easy to find)

### 15.3 General Housekeeping

The following general housekeeping requirements shall be observed and maintained by all GFI Composites employees at all times:

### **15.3.1 Smoking, eating or drinking**

Smoking, eating or drinking in the work area shall be prohibited where toxic materials are handled. The eating area should be separate from the work area and shall be cleaned properly each shift.

### **15.3.2 Surfaces**

Floors: Poor floor conditions are a leading cause of incidents so cleaning up spilled oil and other liquids at once is important. Allowing chips, shavings and dust to accumulate can also cause incidents. Trapping chips, shavings, glass fiber and dust before they reach the floor or cleaning them up regularly can prevent their accumulation.

Keeping floors in good order also means replacing any worn, ripped, or damaged flooring that poses a tripping hazard.

### **15.3.3 Light Fixtures**

Dirty light fixtures reduce essential light levels. Clean light fixtures can improve lighting efficiency significantly. All burned out lighting shall be replaced immediately. All lighting that does not meet the required electrical code requirements shall be corrected to ensure electrical risks are minimized or eliminated.

### **15.3.4 Aisles**

Aisles should be wide enough to accommodate people and vehicles comfortably and safely. Aisle space allows for the movement of people, products and materials. Warning signs and mirrors can improve sight-lines in blind corners. Arranging aisles properly encourages people to use them so that they do not take shortcuts through hazardous areas.

Keeping aisles clear is important. They should not be used for temporary "overflow" or "bottleneck" storage. Aisles also require adequate lighting.

### **15.3.5 Spill Control**

The best way to control spills is to stop them before they happen. Regularly cleaning and maintaining machines and equipment is one way. Another is to use drip pans and guards where possible spills might occur. When spills do occur, it is important to clean them up immediately. Absorbent materials are useful for wiping up greasy, oily or other liquid spills. Used absorbents must be disposed of properly and safely.

### **15.3.6 Tools and Equipment**

Tool housekeeping is very important, whether in the tool room, on the rack, in the yard, or on the bench. Tools require suitable fixtures with marked locations to provide orderly arrangement, both in the tool room and near the work bench. Returning them promptly after use reduces the chance of being misplaced or lost. Workers should regularly inspect, clean and repair all tools and take any damaged or worn tools out of service.

### **15.3.7 Maintenance**

The maintenance of buildings and equipment may be the most important element of good housekeeping. Maintenance involves keeping buildings, equipment and machinery in safe, efficient working order and in good repair. This includes maintaining sanitary facilities. Broken windows, damaged doors, defective plumbing and broken floor surfaces can make a workplace look neglected; these conditions can cause



accidents and affect work practices. So it is important to replace or fix broken or damaged items as quickly as possible. A good maintenance program provides for the inspection, maintenance, upkeep and repair of tools, equipment, machines and processes. (See GFI Composites Maintenance Policy and Form)

### **15.3.8 Waste Disposal**

The regular collection, grading and sorting of scrap contribute to good housekeeping practices. It also makes it possible to separate materials that can be recycled from those going to waste disposal facilities. Allowing material to build up on the floor wastes time and energy since additional time is required for cleaning it up. Placing scrap containers near where the waste is produced encourages orderly waste disposal and makes collection easier. All waste receptacles should be clearly labeled (e.g., recyclable glass, plastic, scrap metal, etc.).

### **15.3.9 Storage**

Good organization of stored materials is essential for overcoming material storage problems whether on a temporary or permanent basis. There will also be fewer strain injuries if the amount of handling is reduced, especially if less manual materials handling is required. The location of the stockpiles should not interfere with work but they should still be readily available when required. Stored materials should allow at least one metre (or about three feet) of clear space under sprinkler heads.

Stacking cartons and drums on a firm foundation and cross tying them, where necessary, reduces the chance of their movement. Stored materials should not obstruct aisles, stairs, exits, fire equipment, emergency eyewash fountains, emergency showers, or first aid stations. All storage areas should be clearly marked.

Flammable, combustible, toxic and other hazardous materials should be stored in approved containers in designated areas that are appropriate for the different hazards that they pose. Storage of materials should meet all requirements specified in the fire codes and the regulations of environmental and occupational health and safety agencies in your jurisdiction.

## 16.0 Personal Protective Equipment (PPE)

The Standards listed below are referenced to assist GFI Composites in meeting the personal protective equipment requirements of the provincial Occupational Health and Safety Act and regulations.

Standard Agency	Standard Number	Standard Title
CSA	CAN/CSA Z94.4	<i>Selection, Care and Use of Respirators</i>
CSA	CAN/CSA Z94.1	<i>Industrial Protective Headwear</i>
CSA	CAN/CSA-Z94.3	<i>Industrial Eye and Face Protectors</i>
ANSI	Z87.1	<i>Practice for Occupational and Educational Eye and Face Protectors</i>
CSA	Z195	<i>Protective Footwear</i>

**NOTE:** CSA Standards reference in the GFI Composites safety manual and referenced in the provincial Occupational Health and Safety regulations can be viewed at the following web site:

<http://ohsviewaccess.csa.ca/default.asp>

### 16.1 PPE Selection, Maintenance and Use

Personal protective equipment shall be selected and used in accordance with recognized standards and provide effective protection and shall not in itself create a hazard to the wearer; PPE shall be compatible so that one item of personal protective equipment does not make another item ineffective and all PPE shall be maintained in good working order and in sanitary condition.

GFI Composites shall ensure that any worker who wears personal protective equipment is adequately instructed in the correct use, limitations and assigned maintenance duties for the equipment to be used.

### 16.2 Personal clothing and accessories

- Personal clothing of any GFI Composites worker shall be of a type and in a condition which does not expose them to an unnecessary or avoidable hazard.
- Where there is a danger of contact with moving parts of machinery or with electrically energized equipment, or where the work process presents similar hazards, the clothing of a worker shall fit closely about the body.
- Dangling neckwear, bracelets, wristwatches, rings or similar articles shall not be worn, except for medical alert bracelets which may be worn with transparent bands that hold the bracelets snugly to the skin
- Cranial and facial hair shall be confined or worn at a length which shall prevent it from being snagged or caught in the work process.

### 16.3 Eye and face protection

GFI Composites shall ensure that any worker who handles or is exposed to materials or conditions that are likely to injure or irritate the eye or face shall wear properly fitting face and eye protection based on

the risks involved and in accordance with the requirements of CSA Standard CAN/CSA Z94.3 "Industrial Eye and Face Protectors".

## 16.4 Foot Protection

Where it has been determined through a hazard or risk assessment that protective safety footwear is required to have toe protection, metatarsal protection, puncture resistant soles, dielectric protection or a combination of these, the footwear shall meet the requirements of CSA Standard CAN/CSA-Z195 for Protective Footwear.

There are two CSA Standards that should be referenced in conjunction with each other. They are: *CSA Standard CAN/CSA-Z195, Protective Footwear*, and *CSA Standard CAN/CSA-Z195.1, Guideline on Selection, Care and Use of Protective Footwear*

GFI Composites shall determine the appropriate protection required for the feet and ankles based on the work assigned to each worker, and ensure each worker wears the appropriate footwear.

## 16.5 High visibility apparel

A GFI Composites worker whose duties are regularly performed in areas and under circumstances where they are exposed to the danger of moving vehicles or heavy equipment shall wear distinguishing apparel containing highly visible material suitable for daytime or night time use, as appropriate.

### 16.5.1 Classes of High Visibility Safety Apparel

Classes are based on the risk of the Job being performed. The class number will determine the amount of body coverage that is required by HVSA.

#### Class 1: Low Risk – Moderate Risk

Some criteria for this category are:

- Limited traffic and moving equipment with low speeds less than 20 kph
- Ample separation from the user and conflicting vehicle traffic
- Work activity permits full, undivided attention to approaching traffic.
- Areas that enable passers by to distinguish workers from the background.

#### Class 2: Moderate to High Risk

Some criteria for this category are:

- Higher volumes of traffic and moving equipment with speed more than 20 kph
- Reduced separation from the user and conflicting vehicle traffic
- Work activities that take place in or adjacent to unimpeded traffic.
- Backgrounds that are complex and reduce ones ability to notice workers

- Greater flame resistant (FR) requirements

### **16.5.2 Colour/Level of Performance of High Visibility Safety Apparel**

The background material of the HVSA should be of *brightly coloured (Level 1) or fluorescent (Level 2) material* and have contrasting reflective stripes/bands. Background material can cover the whole garment (Class 2) or a portion (Class 1) of the garment. Three Colours can be used: Red, Orange-Red, or Yellow-green. Fluorescent colours are more effective than bright colours under low light conditions.

### **16.6 Flame Resistant (FR) clothing**

Where a GFI Composites worker may be exposed to a flash fire or electrical equipment flashover, we shall ensure that the worker wears flame resistant outerwear and uses other protective equipment appropriate to the hazard.

### **16.7 Respiratory protection program**

Where GFI Composites work in an environment which contains airborne contaminants associated with a work process required, GFI Composites shall establish, implement and maintain, and revise where necessary, a written respiratory protection program in accordance with CSA Standard Z94.4 "Selection, Use and Care of Respirators".

#### **16.7.1 Respiratory protection**

When a GFI Composites worker is or may be exposed to an oxygen deficient atmosphere or harmful concentrations of air contaminants, atmospheric contamination shall be prevented to the extent practicable by accepted engineering controls and when engineering or other controls are not practicable, appropriate respiratory protection equipment shall be used in accordance with this section.

Respiratory protection equipment shall be provided by GFI Composites when the equipment is necessary to protect the health of a worker.

Facility access points shall display signs warning that respiratory protection equipment is required and naming the contaminant or hazard involved.

#### **16.7.2 Respiratory protection equipment**

Section 83 of the OHS Regulations requires that appropriate respiratory protective equipment must be selected in accordance with CSA Standard CAN/CSA-Z94.4, Selection, Use and Care of Respirators. The equipment is also to be selected by GFI Composites in consultation with workers and worker health and safety designate, as applicable.

#### **16.7.3 Respiratory Protection Guidelines**

GFI Composites shall select and provide appropriate respiratory protection equipment based on the respiratory hazard to which a worker is exposed and workplace and user factors that affect the performance and reliability of the equipment.

GFI Composites shall conduct an appropriate respiratory risk assessment where applicable and shall identify and evaluate the respiratory hazards in the workplace, and the evaluation shall include an

employee's potential exposure to respiratory hazards and an identification of the contaminant's chemical composition and physical state.

GFI Composites shall not permit a respirator with a tight-fitting face-piece to be worn by an employee who has

- hair on the face or scalp that is likely to prevent effective sealing of the face-piece to the facial skin; or
- a condition that interferes with the face to face-piece seal or valve function.

Where a GFI Composites employee wears corrective glasses or goggles or other personal protective equipment, the employer shall ensure that the equipment is worn in a manner that does not interfere with the seal of the face-piece to the face of the user.

Where a tight-fitting respirator is used by a GFI Composites employee, we shall ensure that the employee performs a user seal check before each use.

### **16.7.3.1 Inspection and maintenance of respiratory protection equipment**

Respiratory protection equipment that is issued for the exclusive use of an employee shall be cleaned and disinfected as often as necessary to maintain it in a sanitary condition.

Respiratory protection equipment that is issued for the use of more than one employee of GFI Composites shall be cleaned and disinfected before being worn by different individuals. GFI Composites shall ensure that respiratory protection equipment is inspected as follows:

- equipment used in routine situations is inspected before each use and after cleaning;
- equipment maintained for use in emergency situations is inspected at least once monthly and according to the manufacturer's recommendations, and is checked for proper function before and after each use; and
- emergency escape only equipment is inspected before being carried into the workplace for use.

Where an inspection of respiratory equipment reveals and type of damage, the equipment shall be removed from service and discarded immediately.

## **16.8 Head Protection**

Safety headgear shall be worn as per the manufacturer's instructions. When wearing a CSA approved safety hardhat, it shall be worn with the brim facing forward. Reversible headwear can be selected and worn if the job, task, or work environment necessitates wearing headwear backward (e.g., for welding). There are CSA Approved hard hats which have been tested in the reverse position and have met CSA Standard CAN/CSA – Z94.1 "Industrial Protective Headwear".

## **16.9 Hearing Protection**

When a GFI Composites worker is required to work in an area in which noise levels exceed the criteria for permissible noise exposure established by the ACGIH Noise Threshold Limit Values (TLVs), GFI Composites shall first take appropriate action to implement control measures to reduce noise to acceptable levels.

Where it is not practicable to reduce the noise to acceptable levels or to isolate workers from the noise, GFI Composites workers shall wear personal protective equipment in accordance with CSA Z94.2 "Hearing Protection Devices - Performances, Selection, Care and Use".

GFI Composites will provide training and education for all workers in the health hazards of noise and the fitting, maintenance, care and use of hearing protection.

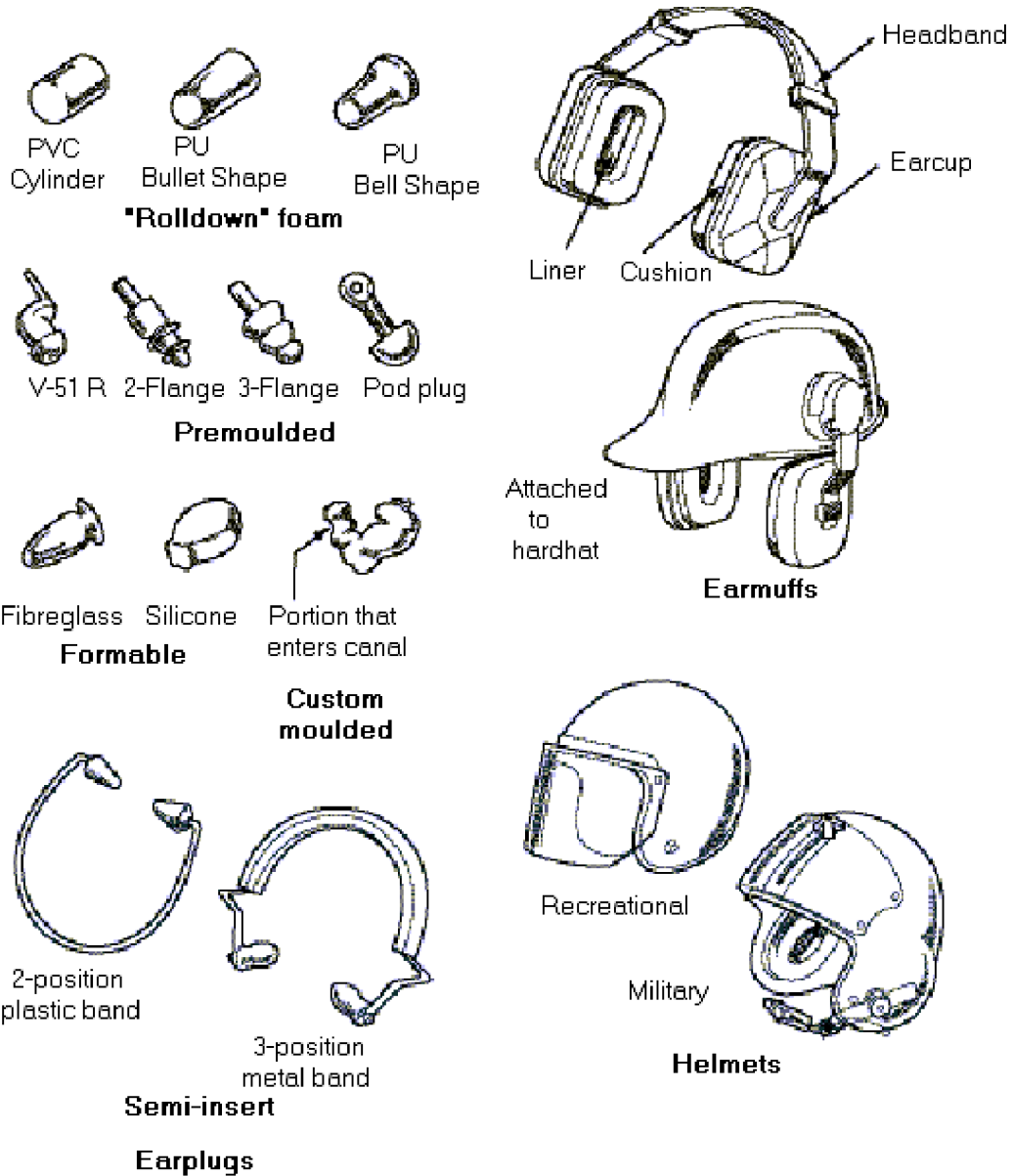
GFI Composites shall post and maintain signs at entrances to or on the periphery of areas where persons are exposed to high noise levels in excess of the threshold limit. These signs shall clearly state that a noise hazard exists and shall describe the personal protective equipment that is required.

Personal Protective Equipment (PPE) regarding noise control is a last resort when there is no other viable option. Even then, the PPE must be able to bring the exposure levels of the noise to within the acceptable Threshold Limit Values (TLV) as outlined by the American Conference of Industrial Hygienists (ACGIH) Noise TLVs.

The current applicable standard is the *CSA Standard Z94.2*. This standard provides a process for selecting adequate hearing protection for noise-exposed individuals, taking into account factors such as:

- Worker noise exposure
- Worker hearing ability
- Use of other personal protective equipment
- Temperature and climate
- Physical constraints of the worker or work activity

**16.10 Types of hearing protection solutions which shall be considered by GFI Composites**



**16.11 GFI Composites Personal Protective Equipment Guidelines**

GFI Composites will use the following guidelines as a general resource in helping assist with our focus on the identification, selection and use of personal protective equipment.

**16.11.1 When to use PPE:**

- Ensure engineering and administrative controls are considered first. PPE is the last line of defense.
- Secure the active participation of all workplace parties.
- Ensure a clear, concise company policy has been formulated
- Examine the training program

**16.11.2 Workplace Survey**

- Review work practices, job procedures, equipment and site layout
- Use job hazard assessment to integrate accepted safety and health principles and practice into specific operations

**16.11.3 Selection**

- Choose PPE to match the hazard
- Obtain advice on proper selection
- Institute workplace trials
- Consider the physical comfort of PPE
- Evaluate cost considerations of PPE usage
- Ensure PPE meets standards / certification (e.g., CSA)

**16.11.4 Fitting and wearing**

- Ensure program includes the individual fitting of PPE
- Survey users to ensure PPE is worn properly

**16.11.5 Maintenance**

- Ensure that workers know how to perform regular maintenance and inspection of their PPE

**16.11.6 Training**

- Verify that all users, supervisors, selectors, buyers, and storekeepers are trained
- Ensure that education programs are ongoing

**16.11.7 Auditing the Program**

- Review the program at least annually
- Review and compare production and safety performance records

**16.11.8 Worker responsibilities include:**

- Make sure you are wearing the right PPE for the job. Check with your safety representative if you are not sure.

**16.11.9 Maintenance and inspection**

- Inspect PPE before and after each use
- Take care of PPE at all times
- Clean all PPE after use
- Repair or replace damaged or broken PPE



- Store PPE in clean dry air - free from exposure to sunlight or contaminants

#### **16.11.10 Training**

- Ensure you have been trained in how to fit, wear, and maintain PPE
- Ensure training program includes information that explains when and what PPE should be worn, and why it should be worn

**Reference: GFI-HSE-POL-003-Personal Protective Equipment Policy**

## 17.0 Harassment

GFI Composites will not tolerate harassment on the basis of any protected grounds.

Workplace harassment is a form of discrimination. GFI Composites promotes and maintains a workplace that is free from harassment. This means that we strongly discourage harassment in the workplace. If harassment does occur, we will take prompt action to stop the misconduct and prevent it from reoccurring.

The Newfoundland and Labrador Human Rights *Code* lists the personal characteristics, or *grounds*, on which discrimination and harassment are prohibited in this province. The grounds listed in the *Code* are as follows:

- race
- sexual orientation
- religion
- marital status
- religious creed
- family status
- political opinion
- age
- colour
- physical disability
- ethnic, national, or social origin
- mental disability
- sex (including pregnancy)
- source of income (regarding housing)

GFI Composites shall ensure that all employees are aware of the harassment provisions in the *Code and the GFI Composites policy*. GFI Composites shall ensure that we have training for all employees on these issues. GFI Composites shall maintain awareness of potentially harassing behaviours in the workplace and deal with these complaints in a timely and sensitive manner.

GFI Composites, in cooperation with our employees, is committed to a safe and healthy, work environment, free from harassment of any kind for all our employees. To ensure our expectations for a harassment-free work environment is known and understood throughout the company, the GFO Composite policy is intended to prevent harassment of our employees and to deal quickly and effectively with any alleged incident that might occur.

### 17.1 Harassment Basics

Harassment is any unwelcome physical, visual or verbal conduct. Quite simply, it is against the law. Harassment may include verbal or practical jokes, insults, threats, personal comments or innuendo. It may take the form of posters, pictures or graffiti. It may also involve touching, stroking, pinching or any unwelcome physical contact. Any behaviour that insults or intimidates is considered to be harassment if a reasonable person should have known that the behaviour was unwelcome by the recipient.

The Newfoundland Human Rights Code protects everyone within provincial jurisdiction from harassment and other forms of discrimination on the basis of race, religion, sex, (including pregnancy and sexual orientation), marital status, physical disability, mental disability, political opinion, colour or ethnic, national or social origin and age (in employment only, between the ages of nineteen and sixty-five).

## **17.2 Harassment Procedure**

### **If an employee of GFI Composites perceives they are being harassed they shall:**

- Tell the individual his/her behaviour is unwelcome and ask him/her to stop. Give the harasser an opportunity to end the harassment.
- Maintain a record of incidents (dates, time, locations, possible witnesses, what happened, your response). You do not have to have a record of events to file a complaint, but a record can strengthen your case and help you to remember details over time.
- Report the problem and file a complaint to one of the following individuals:
  1. Patrick Galway
  2. Denis Galway

You also have the right to file a complaint with the Newfoundland Human Rights Commission. A complaint has to be filed with the Commission within six months of the last incident. Within Newfoundland the toll free number is: 1-800-563-5808. Telephone numbers in St. John's are: (709) 729-2709 or (709) 729-5812.

## **17.3 Dealing with the Complaint:**

Once a complaint is received by GFI Composites, an investigation will be undertaken immediately by management and all necessary steps will be taken to resolve the problem. As part of the process for addressing the alleged harassment, the following steps shall be initiated:

1. The complainant and the alleged harasser will both be interviewed along with and other individuals or witnesses who may be able to provide relevant information.
2. If the investigation reveals sufficient and objective evidence to support the complaint of harassment, the harasser will be disciplined appropriately. Discipline may include suspension or dismissal, and the incident will be documented in the harasser's file. Where the complaint is filed in good faith, documentation will be placed in the complainant's file, whether the complaint is upheld or not.
3. If the investigation fails to find evidence to support the complaint, there will still be documentation concerning the complaint placed in the file of the alleged harasser.
4. Any complainant who has lost opportunity for job advancement, promotion, wage raise, etc., due to harassment, will have his or her qualifications re-examined in a fair, unbiased manner.

## **17.4 Responsibility of GFI Composites Management:**

It is the responsibility of the management of GFI Composites supervising to take immediate and appropriate action to report or deal with incidents of harassment whether brought to their

attention or personally observed. Under no circumstances shall a legitimate complaint be dismissed or down played or the complainant told to deal with it personally.

GFI Composites strives to provide a safe, healthy and rewarding work environment for its employees. Harassment will not be tolerated within this company. Any allegation of harassment shall be reported to the management of GFI Composites immediately.

## 18.0 Disability Management and Early and Safe Return to Work

GFI Composites is committed to the principles and practice associated with early and safe return to work after an accident or injury. We recognize the requirement to meet the expectations of Section 89 of the *WHSC Act*, which states that employers and workers must co-operate with each other and the Workplace Health, Safety and Compensation Commission in early and safe return to work. While we understand the need for cooperation, we also understand the need to protecting the confidential information associated with any early and safe return to work scenario and are equally committed to protecting this confidential information. Accordingly, GFI Composites commits to the following:

- We will ensure we outline roles and responsibilities of the parties involved in return to work (employer, injured worker, co-workers, union, return-to-work representatives, etc.)
- GFI Composites will follow *Hierarchy of Return to Work* according to the WHSCC Policy RE-18, which enables progressive return to the pre-injury job.
- GFI Composites recognizes our responsibility to work collaboratively with workers and the Workplace Health, Safety and Compensation Commission to help provides return to work options to injured workers. The goal is to safely return the worker to employment or employability that is comparable to the pre-injury level as soon as possible.
- GFI Composites acknowledges that with effective return to work planning, the human and financial costs associated with workplace injury are significantly reduced.
- GFI Composites understands and accepts that management and workers are obligated to co-operate in the worker's early and safe return to suitable and available employment with the injury employer. This may involve modified work, ease-back to regular work, transfer to an alternate job or trial work to assess the worker's capability.
- GFI Composites further understands and accepts that we have a legislative duty to modify the workplace in order to accommodate the injured worker's return to the workplace, and are obligated to do so to the extent that it does not cause undue hardship for GFI Composites. This may include work site/job modification or on-the-job skills development for alternate work.
- GFI understands there are potential penalties for both the employer and workers do not demonstrate a willingness to cooperate with the spirit, intent and expectations of early and safe return to work requirements and we will work closely with all staff, and the staff of the Workplace Health, Safety and Compensation Commission to ensure cooperation of all parties is achieved in this important area.

**Reference: GFI-HSE-POL-010, Early and Safe Return to Work**

## 19.0 Environmental Management

GFI Composites recognizes the importance of protecting the environment as an integral part of our business. We recognize this importance to both our operations, to our customers and to the general public.

As a result of this recognition, GFI Composites will ensure all staff are made aware of our environmental commitment and our environmental policy.

### **GFI Composites Environmental Policy**

GFI Composites are committed to minimizing any environmental impact which results from our operations and will work diligently with all staff to ensure:

- We maintain our equipment and facilities with due regard for the environment
- We will comply with any relevant environmental legislation and regulations of the provincial and federal government
- We will make all staff aware of this policy and its practical implementation
- We will immediately report to the relevant environmental authority any incidents of environmental impact or damage, including any spills or discharges which have the potential to impact on the environment
- We will commit to look for ways in which we can be creative in our efforts to continually improve our environmental performance

**Reference: GFI-HSE-POL-007, Environmental Policy**

## **20.0 Ergonomics**

GFI composites will work to ensure that our work processes do not pose any unacceptable risk to workers which may be manifested in the form of musculoskeletal injuries. GFI composites shall ensure compliance to the provincial Occupational Health and Safety regulatory requirements for musculoskeletal injury prevention and shall ensure the following approach is implemented to recognize factors in the workplace that may expose workers to a risk of musculoskeletal injury

### **20.1 MSI: risk control**

GFI Composites shall eliminate, or where elimination is not practicable, minimize the risk of musculoskeletal injury to a worker through the implementation of control measures which might include one or more of the following:

- providing, positioning and maintaining equipment that is designed and constructed to reduce or eliminate the risk of musculoskeletal injury;
- developing and implementing safe work procedures to eliminate or reduce the risk of musculoskeletal injury;
- implementing work schedules that incorporate rest and recovery periods, changes to workload or other arrangements for alternating work; and
- providing personal protective equipment (PPE) as required (NOTE: personal protective equipment may only be used as a substitute for engineering or administrative controls where it is used in circumstances in which those controls are not practicable.

### **20.2 MSI: education and training**

GFI Composites shall ensure that a worker who is or may be exposed to a risk of musculoskeletal injury is educated in risk identification related to work, including the recognition of early signs and symptoms of musculoskeletal injury and its potential health effects and is trained in the use of specific control measures, including, where applicable, work procedures, mechanical aids and personal protective equipment.

### **20.3 MSI: evaluation**

GFI Composites shall monitor the effectiveness of a control measure implemented to eliminate or reduce the risk of musculoskeletal injury and where this monitoring identifies a risk of musculoskeletal injury that is not or has not been eliminated or reduced, GFI Composites shall implement additional control measures, where reasonably practicable. GFI Composites shall consult with workplace health and safety designate, on any MSI related initiatives

### **20.4 Seating or standing work**

GFI Composites shall provide and maintain suitable seating for the all workers to enable them to take advantage of that opportunity.

Where a substantial proportion of work can be done while seated, GFI Composites shall provide and maintain seating that is suitably designed, constructed, dimensioned and supported for the worker to do the work, including, where necessary, a footrest that can readily and comfortably support the feet. Where a GFI Composites worker is required to stand for long periods in the course of their work, GFI Composites shall provide an ant fatigue mat, footrest or other suitable device to provide relief.

## 20.5 Lifting and handling

GFI Composites shall ensure, where reasonably practicable, that suitable equipment is provided and used for the handling of heavy or awkward loads.

Where use of equipment is not reasonably practicable, GFI Composites shall take all practicable means to adapt heavy or awkward loads to facilitate lifting, holding or transporting by workers, or to otherwise minimize the manual handling required.

The definition of "musculoskeletal injury" includes reference to a sprain, strain, and inflammation that may be caused or aggravated by work.

- A **sprain** is a joint injury in which some of the fibres of a supporting ligament are ruptured but the continuity of the ligament remains intact.
- A **strain** is an overstretching or overexertion of some part of the musculature.
- An **inflammation** is a localized response to injury or trauma that is marked by increased blood flow, redness, heat, pain, swelling, and often a loss of function.

Risk recognition will be conducted by persons who are knowledgeable of work procedures, and the associated MSI risk factors. The risk recognition process can be a part of a workplace safety inspection carried out under Section 18 – Safety Inspections, of the Regulations.

Note: **Section 54** requires that the Workplace Health and Safety Designate, as applicable, must be consulted on risk recognition.

## 20.6 Recognizing MSI risk factors.

In recognizing risk factors, GFI Composites shall give priority to jobs which have a high risk of MSI.

GFI Composites shall check past workplace records for evidence of MSI, including reports by workers of poor working conditions, first aid records and claims history. The records, if available, shall be examined for a sufficient period of time to ensure that any occurrences are recognized, and where possible, that any patterns are clear. To achieve both objectives it is recommended that records be kept for at least several years.

### 20.6.1 Objectives of the risk evaluation

The objectives of the risk evaluation shall include:

- Determining the extent of impact of various risk factors on the potential for MSI,
- Where feasible, determining the relative risk of MSI among workers or groups of workers.

Some Risk Factors GFI Composites shall consider:



### **20.6.1.1 Awkward postures**

“Postures” refer to the position of body parts during any activity. Most joints are in a “neutral” posture when they are being used ear the middle of their full range of motion. An “awkward posture” refers to a posture that is not neutral (e.g. over head reaching). The more awkward the posture, (i.e. the further from neutral that a joint moves), the more strain is put on the muscles, tendons and ligaments around the joint (e.g. leaning over a bath while bathing a patient). Postures to watch for include:

- Twisting the torso,
- Shoulder abduction or flexion,
- Flexion or extension of the wrist,
- Ulnar deviation of the wrist,
- Squatting, stooping and bending,
- Flexion or extension of the neck, and
- Rotation or side bending of the neck.

### **20.6.1.2 Duration**

Awkward body postures, repetitive tasks and forceful tasks that are held or performed for long periods of time can cause muscles to tire quickly and to become prone to injury. “Duration”, or how long a task is performed or a posture is held, should be considered in combination with each of the previous three risk factors. For example:

- For how long is the worker using force? (e.g. to grasp or hold an object)
- For how long is the worker performing a repetitive task?
- For how long does the worker work in an awkward posture?

### **20.6.1.3 Layout and Condition of Workplace or Workstation**

Various conditions tend to combine two or more of the risk factors outlined in this section. These conditions can be recognized in the workplace by performing inspections, communicating with employees and using surveys, among other risk recognition methods.

### **20.6.1.4 Local contact stresses**

This refers to physical contact between body tissues (in a small localized area) and objects in the work environment such as tools, machinery, and products. Local contact stress, when applicable, usually involves the knee, shoulder, elbow, wrist, or hand. Point pressure may also occur at the sides of fingers. Excessive, repeated or prolonged pressure over these areas may inhibit nerve function and/or blood flow.

### **20.6.1.5 Working reaches**

This refers to the risks that can result from reaching behind the shoulder, forward, or across the body (i.e. using awkward postures). This factor may cause MSI, either through a single incident or through a repetitive or cumulative process.

#### **20.6.1.6 Working heights**

This refers to the risks from having to accommodate to inappropriate work surface heights for an extended period of time. (i.e. using awkward or sustained postures).

#### **20.6.1.7 Seating**

This refers either to the physical properties of a chair or seat, or prolonged sitting required by some jobs. The Canadian Standards Association (CSA) has issued the standard *CAN/CSA-Z412 A Guideline on Office Ergonomics*. This publication can assist with an understanding of this factor. Other publications are also available on this topic through the Canadian Centre for Occupational Health and Safety (CCOHS at [www.ccohs.ca](http://www.ccohs.ca)) or other OHS Agencies.

#### **20.6.1.8 Floor surfaces**

This refers to the physical characteristics of a floor, including grade, surface texture and material, unevenness, and slip resistance. Examples of risk factors associated with floor surfaces include:

- Sloped surfaces and ramps, which can result in an increased effort to carry, push, pull, or manipulate loads,
- Hard surfaces, which can cause increased fatigue and back discomfort to workers who have to stand on them for an extended period of time,
- Uneven work surfaces, which can increase the force needed to move objects,
- Slippery floors, which can cause an increased risk of falling or slipping.

## **21.0 GFI Composites Policies, Procedures and Forms**

### **21.1 GFI Composites Forms**

GFI-HSE-FM-001-Risk Assessment Form

GFI-HSE-FM-002- Risk assessment Matrix

GFI-HSE-FM-003 – Incident Investigation Form

GFI-HSE-FM-004-Maintenance Record

GFI-HSE-FM-005-Employee Orientation Form

GFI-HSE-FM-006-Monthly Safety Statistics Form

GFI-HSE-FM-007 – Safety Corrective/Preventive Action Form

GFI-HSE-FM-008-Medical Treatment Record

GFI-HSE-FM-009-Site Safety Inspection Form

GFI-HSE-FM-010 – General Worksite Safety Inspection Form

GFI-HSE-FM-011-Tool Box Talk

GFI-HSE-FM-012 – Monthly Safety Activities Summary

GFI-HSE-FM-013-Annual Health and Safety Objectives

### **21.2 GFI Composites Policies**

GFI-HSE-POL-001-Health and Safety Policy

GFI-HSE-POL-002-Maintenance Program Policy

GFI-HSE-POL-003-Personal Protective Equipment Policy

GFI-HSE-POL-004-Inspection Policy

GFI-HSE-POL-005-Safety Training Policy

GFI-HSE-POL-006- Incident Investigation Policy

GFI-HSE-POL-007-Environmental Policy

GFI-HSE-POL-008-Safety Audit Policy

GFI-HSE-POL-009 – Disciplinary Policy

GFI-HSE-POL-010-Early and Safe Return to Work Policy

### **21.3 GFI Composites Safety Procedures**

Chop Gun

Forklift

Grinder

Fiberglass Chopper

Table Saw

Compressed Air

Lock Out-Tag Out