



1.0 Introduction

Canadian Plains Energy (CPES) is committed to protecting people, the environment, the public and its property from injury, damage, and loss. This is accomplished through continual hazard identification, assessment, and control processes. The desirable end result is to maintain a safe and healthy environment, while achieving sound operational (construction, fabrication, maintenance, electrical and instrumentation) practices and efficient project execution.

CPES management will provide resources (human, tools, and equipment), procedures, practices and training to aid in the safe execution of work. Thus creating a climate that encourages worker participation in the development, implementation and support of the health, safety and environment management system. All workers are expected to participate in the identification of hazards, assessment of the hazards and implementation of identified controls for specific tasks and jobs.

Note: With direct involvement, workers provide valuable insight into performing their jobs safely and efficiently. Workers will improve the quality and usefulness of safe job procedures (SJP) and safe work practices (SWP) by assisting in their development and updating. As a result, worker commitment and ownership are created.

2.0 Scope

Hazard identification, assessment and control processes are used to identify health, safety and environmental hazards, assess the associated risks from those identified hazards and implement controls to the associated hazards. Hazard Sources and hazards are required to be continually identified, assessed, and controlled.

The requirements specified in Section 2 and this policy, apply to all Company employees, independent service providers (ISP), and subcontractors working for or through CPES.

CPES performs operations in multiple government jurisdictions. It is expected that management and workers ensure the Hazard Identification, Assessment and Control processes intended for use, as a minimum, meet legislated requirements.

3.0 Objectives

To provide a framework for consistent hazard identification, assessment and control while maintaining compliance with legislated requirements for all operations within CPES.

4.0 Key Policy Statements

- CPES will provide the resources for effective hazard identification, assessment, and control.
- All levels of the workforce will be trained in Hazard Identification, Assessment and Control (HIAC).
- Incorporate the **hazard source model** into the CPES methodology for hazard identification, assessment, and control.
- All workers on CPES projects or facilities shall use the tools communicated within Section 2.
- Subcontractors will use CPES hazard identification, assessment, and control tools, unless their hazard identification, assessment and control program meet or exceeds CPES's.
- Ensure a consistent risk assessment process is utilized across CPES.
- Management shall ensure effective hazard identification, assessment and control methodologies and program are in place. The Manager shall:
 - a) Establish the application for hazard identification, assessment, and control for his/her business unit (BU),



HAZARD IDENTIFICATION, ASSESSMENT AND CONTROL

Section 2.0

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Policy

- b) Review and retain documentation as required,
- c) Communicate and delegate roles and responsibilities of the hazard identification, assessment, and control program to all supervision levels,
- d) Verify resources are in place, effective, documented and retained,
- e) Facilitate routine evaluation to determine the effectiveness of the hazard identification, assessment, and control program,
- f) Ensure the hierarchy of controls is being applied.

Hazard assessments are performed to protect people from injury and/or occupational disease while also protecting the environment, company, and public acts.

In addition, management and supervision must ensure that hazards, at risk behaviour and/or near misses are routinely identified and followed up on to ensure higher levels of control are implemented.

APPROVED:



Aaron Karpan, President

1.0 Code of Practice

A code of practice provides practical guidance on the requirements of the company standard, jurisdictional regulations, or the adopted code applicable to the work site, safe working procedures in respect to the work site, and other matters as required within the jurisdiction the work is being performed.

1.1 Critical Task

A critical task is a task that has been assessed as CPES's highest risk based on internal and industry experience. (e.g., rigging and hoisting, energy isolation, driving, confined space, ground disturbance).

1.2 Safe Job Procedure

A procedure is a step-by-step sequence of actions to complete a specific task (i.e., Step 1 must be completed before going to Step 2). Safe Job Procedures are particularly important for Critical Tasks.

1.3 Prime Contractor

The organization responsible or having primary control and accountability to ensure the health and safety of workers on a worksite. The prime contractor is typically the site owner but can be formally transferred to another organization or entity such as CPES (see COP 09 for more information). The prime contractor has a responsibility to "ensure that any employer on a work site is made aware of any existing or potential work site hazards that may affect that employer's workers."

1.4 Subcontractor

Companies that supplies labour and provides contract services in addition to supplying materials and equipment onsite

1.5 Independent Service Provider (ISP)

A business that is a self-employed contract service provider who is responsible for their own business risk coverage. An ISP is usually engaged to fulfill a specific need such as project supervision, welding, pipefitting, operating equipment, construction equipment owners and operators, hauling construction equipment, etc. ISP are required to follow CPES HSEMS processes. For more information on ISP refer to Section 7 in CPES's Procedure Manual.

1.6 Hazard

A condition or set of circumstances that has the potential for causing harm to people, property, or the environment.

1.7 Hazard Source

A common origin of related hazards and/or potential energy release. CPES has identified thirteen (13) hazard sources, that could cause injury or loss due to unintended release. For example, the hazard source is electricity, and related hazards are overhead power lines, breakers and static.

1.8 Human Factors

Human factors involve the study of all aspects of the way humans relate to the world around them, with the aim of improving operational performance, safety, and risk management. Human performance is the outcome of what a person does, how they interact considering workplace design, procedural design, and behavioural factors.

1.9 Line of Fire

At-risk condition and/or action where a person and/or equipment are at risk of injury and/or damage as a result of the release of energy (i.e. standing in front of a pig trap and/or swing path of pig trap cover).

1.10 Pinch Points/Crush points

At-risk condition and/or action where a person is at risk of injury as a result being contacted by equipment and/or items in motion (i.e. standing between pieces of moving equipment and/or stationary object, like a side-boom and a pipeline, or hands/fingers between pipe flanges during bolt-up).

1.11 Point of Entry

The route by which a product of substance enters the body (e.g., absorption, inhalation, and ingestion).

1.12 Refusal of Unsafe Work

A worker has the obligation to Refuse Unsafe Work, if the worker believes that a specific task requested of them is unsafe or hazardous to them or to others.

1.13 Risk

Probability of injury, occupational disease or loss. Probability and severity of loss are linked to hazard sources.

1.14 Risk Assessment

A risk assessment is a process used to assess the potential for an event to occur as a result of a hazard. Risk assessments consider two distinct criteria, which are probability of occurrence (what is the chance of the event happening) and potential severity (how bad can it be).

1.15 Safe Work Practice

A safe work practice is a set of guidelines or key points that must be considered to manage the hazard associated with the task.

1.16 Serious Incident

Refer to the CPES Health, Safety and Environment Management System, Section 10.1, Part 2.7.

1.17 Sharp Surfaces/Edges

At-risk condition where a person is at risk of injury as a result of being in contact with a work surface, equipment or work environment with jagged, sharp or pointed surfaces or edges. (e.g., knives, tin, steel, etc.).

1.18 Significant Incident

Refer to the CPES Health, Safety and Environment Management System, Section 10.1, Part 2.6.

1.19 Stop Work

A formalized process to stop work when conditions become unsafe at a worksite. An investigation and implementation of corrective actions is required before work can resume.

1.20 Stop Task

A process to stop task to complete a hazard reassessment and self assessment.

1.21 Tasks

Are the specific sequence of steps, actions, or activities a worker must perform to complete their job or work assignment.



1.22 Task Hazard Analysis (THA)

A task hazard analysis is an analysis process of breaking out the steps relative to completing the task, identifying the specific hazards and controls for each step, and risk ranking each step required.

1.23 Training

Training is one of the processes required to establish competency (the others are knowledge and experience). Examples of training include:

- Orientation of new or transferred workers
- Qualifications and skills training
- On-the-job training and competency assessment (to industry and company accepted standards)

1.24 Worker

A person engaged in an occupation and/or task.

1.0 Employee/Worker Responsibilities

It is the responsibility of each employee/worker to:

- Engage in the identification, assessment, and control of workplace hazards.
- Assist Supervisors & management in identifying hazards on the job.
- Report any uncontrolled hazards to their Supervisor or management.
- Refuse unsafe work or situations.
- Communicate at-risk conditions to others on the worksite.
- Utilize the Safety Observation (SOC) Program to help identify and communicate hazards, correct at-risk behaviours, and reinforce positive behaviours.
- Monitor for new hazards and changes, communicate concerns that arise while performing job tasks.
- Stop task and reassess the hazard sources and hazards periodically, after work breaks, and when conditions change.

1.1 Supervisor Responsibilities

It is the responsibility of the Supervisor (Superintendent, Foreman, lead designate) to:

- Lead in the identification, assessment, and control of workplace hazards.
- Ensure that Employees/Workers are trained in the HIAC process.
- Engage with Customer/Owner representatives to ensure hazards are communicated and adequate controls applied.
- Assist and coach Workers with Hazard Identification, Assessment and Control.
- Ensure the hazard identification, assessment, and control (HIAC) process is implemented at the workplace, including completing documentation.
- Communicate hazards and controls with Employees/Workers and ensure they understand what is expected of them.
- Address and control hazard sources by utilizing the hazard control hierarchy.
- Verify that controls have been implemented.
- Complete ongoing assessments of the effectiveness of the HIAC process through site inspections, Worker engagement, incident/near miss investigations, etc.
- Stop work if high-risk hazards remain AFTER controls are applied, and Line Management must be notified.

1.2 Line Management Responsibilities

It is the responsibility of the Managers, Project Managers, or other designated Managers to:

- Ensure effective implementation of Hazard Identification, Assessment and Control (HIAC) process.
- Ensure Supervisors are managing the hazard sources and known hazards through utilizing the hazard control hierarchy.
- Ensure that Subcontractors have an effective HIAC process.
- Monitor the application of CPES HIAC process to determine effectiveness and understanding.
- Mentor and assist with HIAC process.
- Complete ongoing assessments of the effectiveness of the HIAC process through site inspections, Worker engagement, incident/near miss investigations, etc.
- Facilitate resolution of identified extreme and high-risk hazardous situations to a low-risk ranking. If a low-risk ranking is not achievable, then refer to senior management and ensure work is stopped until the hazardous situation is resolved.

1.3 Senior Management Responsibilities

Senior Management (Executives and Regional/General Managers) is responsible for:

- Setting company policy with respect to HIAC.
- Ensuring resources are available to properly complete the HIAC process.
- Reviewing identified extreme and high-risk hazardous situations and provide direction to achieve a low-risk ranking.
- Completing ongoing assessments on the effectiveness of the HIAC process through site inspections, worker engagement, onsite reviews, etc.
- Assessing the effectiveness of HIAC process.

1.4 HS&E Responsibilities

It is the responsibility of the HSE team to:

- Advise, mentor, and assist on the implementation of Section 2, Hazard Identification, Assessment and Control.
- Complete ongoing assessments of the effectiveness of the HIAC process through site inspections, Worker engagement, incident/near miss investigations etc.
- Complete regulatory review to ensure the HIAC process meets the intent of applicable legislation.

1.5 Health and Safety Committees' Responsibilities

Representatives from applicable regulatory Joint Health and Safety Committee, Occupational Health Committee, or Joint Worksite Health and Safety Committee will review the effectiveness of CPES's risk management processes and share lessons learned.

1.6 Subcontractors

It is the responsibility of each Subcontractor to:

- Have an effective HIAC process that meets or exceeds CPES's requirements or utilize CPES's process.
- Have an effective Task Hazard Analysis (THA) and/or Job Safety Analysis (JSA) system or utilize CPES's process.
- Engage in identifying, assessing and controlling workplace hazards.
- Assist Supervisors & management in identifying hazards on the job.
- Report any uncontrolled hazards to a CPES representative.
- Refuse unsafe work or situations.
- Communicate at-risk conditions to others on the worksite to help minimize the potential for injury/incident.
- Utilize the Safety Observation (SOC) Program to help identify and communicate hazards.
- Monitor for new hazards and changes, communicate concerns that arise while performing job tasks.
- Apply stop task process.

1.8 Owner/Customer/Primer Contractor

It is the responsibility of the Owner/Customer/Prime Contractor to:

- Inform CPES representatives of the hazard sources and hazards associated with potential project and/or job being scoped.
- Inform CPES representatives of the site-specific hazards and hazard sources.



1.9 Visitors Responsibilities

It is the responsibility of each visitor to:

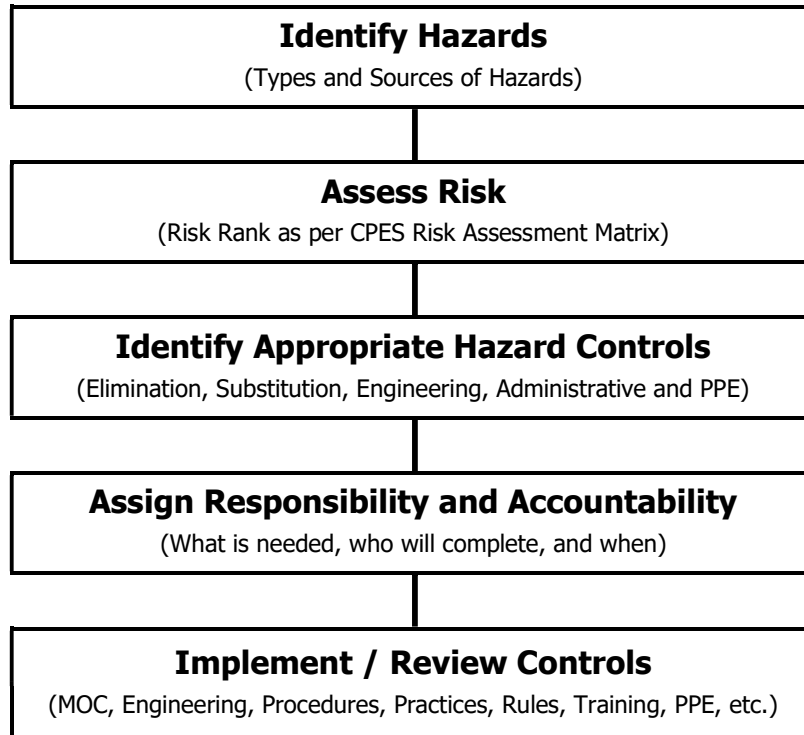
- Always be accompanied by a CPES designated representative and made aware of the site-specific hazards.
- Assist with the identification of hazards.
- Report any uncontrolled hazards to site representatives and/or management.

1.0 Hazard Identification, Assessment and Control (HIAC) Flow Chart

The CPES hazard identification, assessment and control program follows a five-step process to ensure the safety of employees, independent service providers, contractors, the public and protecting the environment, and property from an incident.

Figure 1 – Hazard Identification, Assessment and Control Process

The Hazard Identification, Assessment and Control process includes the following steps:



2.0 Hazard Sources and Human Factors

CPES has identified thirteen (13) hazard sources and human factors that should be considered while developing hazard assessments throughout the work life cycle (e.g., pre-project evaluation, daily task hazard assessments, etc.). Through the practice of identifying hazard source(s) and human factors, the worker/team can consider and identify all hazards related to each source and factor. For example: “electrical” source = overhead power lines, buried power lines, power lines in walls or structures, energized panels, switches, power cords, etc.

Refer to Section 2.5, Hazard Source Examples, for examples of hazards and work activities associated to hazard sources.

Refer to Section 2.6, Human Factors Examples, for examples of human factors.

3.0 Risk Assessment

After the hazards have been identified, their risk must be assessed. CPES uses the **risk assessment matrix** to aid in, determining whether the hazard, situation or substandard condition presents an

unacceptable risk. To determine the level of risk, you must consider the probability and severity of an event occurring.

1. **Potential severity** is based on how severe the event would be if no preventative measures were introduced (Figure 4).

Note: Company reputation and image is also a consideration of potential consequence.

2. **Probability of occurrence** is based on the chances of the event happening if the existing hazards or conditions are not corrected (Figure 3). To judge the probability, look at:

- | | |
|---|--|
| a) Frequency | b) Industry history |
| c) Number of people involved or exposed | d) People's familiarity with the process |
| e) History | f) Prediction |

Figure 3 – Criteria for Evaluating Probability of Occurrence (Before) Controls

Probability of Occurrence	Potential Frequency
5 – Frequent	Expected to occur several times per year within CPES operations or the oil and gas construction industry.
4 - Probable	Likely to occur once every 2-4 years within CPES or the oil and gas construction industry.
3 - Occasional	Likely to occur every 5 – 10 years within CPES or the oil and gas construction industry.
2 - Remote	Not likely to occur within CPES operations at any time. Has been known to occur in oil and gas construction industry.
1 - Improbable	Very unlikely to occur, not impossible. Has been known to happen in the construction industry.

Figure 4 – Criteria for Classifying Incident Severity

		Potential Consequence			
Ranking		Harm To People	Harm To Environmental	Assets	Reputation
Potential Severity	4 - Catastrophic	Permanent or total disability or fatality: <ul style="list-style-type: none"> • Fatality(ies) • Permanent Disability(ies) • Multiple lost time injuries • Occupational Illness such as asbestosis or silicosis 	<ul style="list-style-type: none"> • Effects to fish bearing streams or potable ground water • Clean up cost >\$1M • Emergency Stop Work Order issued by the regulator 	<ul style="list-style-type: none"> • Operational/facility and/or other losses >\$1M, may include client/customer loss 	<ul style="list-style-type: none"> • Impacts > 100 people • National media attention

3- Serious	Injury or health effect: <ul style="list-style-type: none"> • Lost time injury • Occupational exposure such as noise induced hearing loss, asbestos and NORMs 	<ul style="list-style-type: none"> • Spill volume over 100 liters of flammable liquids • Effects to non-fish bearing water bodies • Reportable to government regulator* • Corrosives >5 litres 	<ul style="list-style-type: none"> • Operational/facility and/or other losses \$50K to \$1M, may include client/customer loss • Vehicle damage >\$20K • Equipment damage >\$20K 	<ul style="list-style-type: none"> • Impacts 25 to 100 people • Provincial media attention • OHS Stop Work Order 	
	2- Significant	Injury or health effect: <ul style="list-style-type: none"> • Medical aid • Restricted/Modified work 	<ul style="list-style-type: none"> • Spill volume 15 to 100 liters – controlled products • Corrosives <5 litres 	<ul style="list-style-type: none"> • Operational/facility and/or other losses \$5K to \$50K, may include client/customer loss • Vehicle damage \$5K - 20K • Equipment damage \$5K -20K 	<ul style="list-style-type: none"> • Impacts <25 people • Municipal or community media attention • OHS Compliance Order
		1- Negligible	Injury or health effect: <ul style="list-style-type: none"> • First Aid • Exposure to health hazards that give rise to noticeable discomfort or minor irritation (e.g. welder's flash, frost bite, repetitive strain) 	<ul style="list-style-type: none"> • Spill volume <15 litres (controlled products) • Visible staining/ sheen 	<ul style="list-style-type: none"> • Operational/facility and/or other losses <\$5K, may include client/ customer loss • Vehicle damage <\$5K • Equipment damage <\$5K

Once the hazard's potential severity and probability have been determined, they are applied to the Risk Assessment Matrix (Figure 5). The Risk Assessment Matrix provides Managers, Supervisors, & Workers to assess the degree of risk that a hazard may pose to them prior to implementation of controls to workers, the public, and/or the environment, and determines the appropriate corrective actions to be completed. Refer to Risk Assessment Matrix HSEMS (S-01) and Stop & Think HSEMS (S-02).

The objective of the risk assessment process is to move risk to a lower category in the matrix by either:

- Reducing the probability of occurrence through hazard prevention, or
- Reducing the potential severity of an event through hazard control.

Figure 5 – Risk Assessment Matrix (S-01)

Risk = Severity x Probability		Potential Severity			
		1– Negligible	2 – Significant	3 – Serious	4– Catastrophic
Probability of Occurrence	5–Frequent	5 Medium	10 High	15 Extreme	20 Extreme
	4–Probable	4 Low	8 Medium	12 High	16 Extreme

	3–Occasional	3 Low	6 Medium	9 Medium	12 High
	2–Remote	2 Low	4 Low	6 Medium	8 Medium
	1–Improbable	1 Low	2 Low	3 Low	4 Low

Extreme Risk Work must be stopped and risks must be addressed immediately with additional controls to reduce risk to medium or low risk classification, before work can continue. Immediate interim controls and precautions are acceptable until a final solution is developed and implemented.

High Risk Are undesirable and require additional controls to reduce risk to a medium or low risk classification within a specified time. Consider immediate interim controls and precautions where practical, and notify exposed workers about the hazards.

Medium Risk Should be investigated further to examine the need for additional controls. Reasonable options are typically available to reduce the risk of hazards.

Low Risk May not require any further analysis; apply risk controls as required.

Risk assessments are used as a tool to formulate the criteria for prioritizing which hazards require additional controls measures. The application of controls measures are to be based on the hierarchy of controls which includes elimination, substitution, engineering, administrative and personal protective equipment.

4.0 Instructions for Using the Risk Assessment Matrix

1. Identify the hazards including situations, behaviours, or substandard conditions.
2. Estimate **potential severity** and **probability of occurrence** associated with the hazards.
3. Estimate the hazard risk level from the analysis.
4. Address and control risk situations.
5. Once you have assessed the hazards and ranked them from the matrix, prioritize the hazard according to the number from the risk matrix.
6. Use this as a guide to establish the necessary controls for the highest risk hazards. With this risk assessment matrix, all rankings of ten (10) or more become priority #1 and these should be addressed first.
7. Develop and apply controls.

5.0 Managing Risk

Hazards identified during any type of risk assessment must be managed to acceptable or “LOW” risk ranking. Should existing controls be unable to achieve the “LOW” risk ranking, then work must stop until additional controls are implemented. This may include a review by a Manager and/or external resources.

While completing hazard assessments and risk analysis, we may encounter situations where appropriate controls have not been identified therefore hazards have not been adequately controlled. In these situations, work must stop until adequate controls are in place. Managers must be contacted for all of the “HIGH” or “EXTREME” risk ranking. If you are uncertain of the risk ranking or the ability to manage the risk then consult with appropriate management.

Utilize the Stop Work Order form to communicate to your Manager as per form instructions (Form # CF-S-22). All stop work designations must be investigated by the Manager with support from the Health,

Safety and Environment department. Documenting the status of hazards, recommendations for improvements and the follow up to closure for each action item is required.

6.0 Hierarchy of Controls

Control of hazards may be performed in several ways depending on the level of risk from the specific hazard. Hazards sources may be eliminated completely resulting in the total reduction of risk from that hazard source. Control measures may include a combination of engineering or substitution controls, administrative controls, and the use of Personal Protective Equipment (PPE). All controls should be implemented via the Section 2, Hazard Identification, Assessment and Control (HIAC) process described throughout.

The four approaches to Hazard Control are:

Elimination

The hazard or work has been eliminated or shifted to more appropriate area. Example: Welding expected to be done in a live facility, instead complete welding in a safe area with no flammable/explosive source.

Substitution

A hazardous material or work process is substituted for a less hazardous material or process. Example: Substituting a toxic chemical with a non-toxic chemical.

Engineering Controls

Engineering controls are used for reduction of the risk of exposure by preventing interaction of people with the hazard. Engineering controls may include, but are not limited to:

- a) Isolation or enclosure of the worker or process,
- b) Installation of abnormal operation sensors and emergency shutdown devices,
- c) Use of barricades or other restraining devices to prevent worker contact around or under dangerous or hazardous operations,
- d) Exhaust ventilation,
- e) Guarding, and
- f) Use of specialized materials.

Administrative Controls

Administrative controls are used increase the worker awareness and knowledge of the hazards while reducing their exposure. These may include, but are not limited to:

- a) Developing and implementing procedures, safe work practices and enforceable rules,
- b) Limiting the time of worker exposure,
- c) Using a safety watch person for critical tasks (e.g., fire watch, traffic control, hoisting activities, confined space),
- d) Providing worker training, competency assessment, safety alerts/lessons learned and worksite signage. Refer to **HSEMS Section 8, Training and Communication** for details, and
- e) Direct supervision.

Personal Protective Equipment (PPE)

Personal protective equipment (PPE) is considered the last resort for hazard control. However, PPE is most often used in combination with other hazard controls. The purpose of wearing PPE is to provide additional reduction in the workers' risk by minimizing their contact with the hazards. All workers requiring PPE must be properly trained in its use, care and maintenance.



All persons working at or visiting a CPES location must adhere to all safety requirements, including the wearing of PPE. CPES provides or subsidizes PPE to its employees as required by the job or task. Refer to **HSEMS Section 6, Personal Protective Equipment (PPE)**.

9.0 Implementing/Reviewing Controls

When implementing/reviewing controls, proceed as follows:

- a) Review controls to ensure they meet the intent of hazard control as identified in the Hazard Assessment.
- b) Inform workers and provide training on any additions/deletions of hazards due to equipment and/or process change.



1.0 Introduction

Through the HIAC process our goal is to identify the hazards and manage the risks associated with the work CPES performs to ensure the health and safety of workers and work site environment.

2.0 HIAC Process

HIAC is used to establish higher level hazard identification and control direction throughout the work life cycle including task hazard reassessments, informal continuous assessment process (Stop & Think) and any out of scope work we perform.

Based on the HIAC Processes the following tools shall be utilized to identify and control work site risks. These tools are designed to stimulate the engagement of our employees, ISPs, subcontractors in HIAC. The tools may be applied/utilized differently depending on project scope, customer requirements, etc.

Hazard Identification, Assessment and Control - HIAC (CF-S-01)

HIAC must be completed before work begins at the worksite and reassessed as required. There are three (3) types of scenarios where this tool is utilized:

- Pre-job/Site - High-level analysis of the project within CPES operations. These assessments identify common hazard sources, specific related hazards and the controls needed such as, pressure, toxic/carcinogenic, ground disturbance, electrical, mechanical, fire/explosion, chemical, noise, motion, or work in live facility or green field, etc. This allows for proactive planning for the project or work team in advance of work execution.
- Task Hazard Analysis – To be used while planning work/task(s). This allows for proactive planning to ensure the right tools, equipment, personnel, and preparations are in place for the work. This tool identifies specific hazard sources and the controls that are required. In addition, it provides the opportunity to stop or delay work until additional approvals or resources are sourced.
- Reassessment - The tool can also be used for reassessing work. When the scope, process and/or conditions of planned tasks change.

Task Hazard Analysis (THA) (CF-S-02)

This tool can be used as a template/resource for the individual work teams to develop task procedure for high risk, infrequent, complicated tasks or when no formal SJP exists. The THA will consider the scope of work, steps taken to complete the task, identify hazard sources and specific related hazards. An analysis of the hazards is then completed to assess that risk before and after the implementation and verification of controls. A critical component of the THA is the assessment of risk before and after controls have been identified. The implementation of THAs is at discretion of the Project Manager/ Superintendent.

Pre-job Safety Meeting (Form CF-S-03):

Tool to guide the discussion or planning session(s) for a Project Kickoff in order to identify and initiate planning for key hazards and risks. Part of the pre-job safety meeting should be a discussion on concurrent operations. The implementation of the Pre-Job Safety Meetings is at discretion of the Project Manager/ Superintendent.

Daily Tailgate Meeting (Form CF-S-04):

The daily tailgate meeting is primarily used to communicate the job scope and coordinate work being preformed that day. Additionally, it is used to review the hazards and resulting controls identified in the pre-job or site HIAC. The daily tailgate meeting also provides a list of other critical discussion points such as SJPs, SWPs, recent incidents/learnings, etc. and review of concurrent operations that may be underway that have a potential impact.

Additional Resources:

- S-01 Hazard Assessment Ranking Matrix
- S-02 Stop and Think
- Section 2.6 Hazard Sources Examples
- Section 2.7 Human Factors Examples

3.0 Hazard Reassessment

The hazard reassessment process supplements the CPES HIAC primary methodologies (Pre-Job, Site and Task Hazard Analysis) and supports job or task specific HIAC efforts. The intent is to continue assessing the risk of injuries, incidents, and losses and controlling the hazards during the execution of work. Through reassessment it can be determined if the work can continue or if a more formal work stoppage and corrective actions are needed

Hazard reassessments are to be utilized for the following:

- Scope of work has changed
- New hazard sources/hazards identified
- New personnel enter job site or joins task work
- Conditions change (e.g., job site, weather, site representative, etc.)
- New/different equipment needed to complete task

It is expected that CPES employees/ISPs utilize and document the hazard reassessment process throughout the course of their work. This can be documented on the Hazard Identification, Assessment and Control – HIAC form (CF-S-01).

4.0 Informal (On-going) HIAC Process – Stop & Think

Stop and Think is a process conducted by an individual before starting a task. The process uses the same steps as the Hazard Identification, Assessment and Control – HIAC form (CF-S-01), but it is not documented. In some situations, the informal hazard assessment may trigger a Hazard Reassessment or a Task Hazard Analysis. Informal hazard assessments are performed by individuals and apply to the day-to-day or task-to-task activities.

There are five (5) basic steps to complete the informal hazard assessment. The graphic below provides a summary of the steps involved with performing an informal hazard assessment.

Ask the following questions before performing a task or job:

1. Stop and Think

2. Identify Hazard Sources.

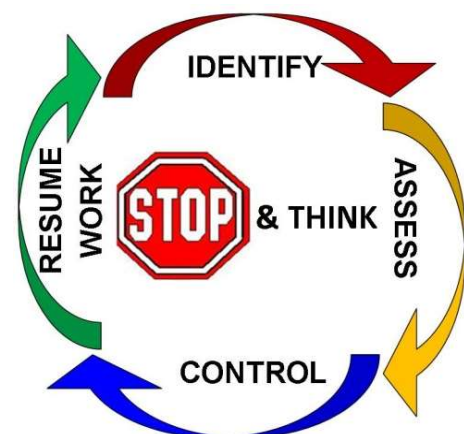
- Do I understand my job/task
- Am I physically and mentally prepared to do each task?
- What could go wrong?
- Is there a danger to myself or others?
- What could change and create a new risk?
- Could other crews, workers or conditions pose a risk to me?
- Can the condition of my equipment and tools pose a risk to me?

3. Assess the Risk

- How likely is this to happen (what is the probability)?
- What are the consequences if this happens?

4. Control the Risk

- Are permits, written procedures, etc. required and available?
- What can I do to reduce the risk?



- Will the control affect another part of the task being done?
- Do I need to tell anyone?
- Is there someone I can call for help?
- Are emergency response plans needed?

5. Resume Work

Refer to S02 for Stop & Think poster.

7.0 Safe Work Permits, Safe Work Agreements and Checklists

Safe work permits/agreements are typically issued by the owner/prime contractor on worksites. CPES may issue safe work permits when we are the Prime Contractor. Reference COP 09 Safe Work Permit for more information.

9.0 Hazard Assessment and Other Tools

Other CPES methodologies for hazard assessment and reassessment include:

- Safety Observation Card (SOC): CF-S-08
- Stop Work: CF-S-22

10.0 Health, Safety and Environmental Inspections

Planned health, safety and environmental inspections are important management tools for preventing events. Inspections provide an opportunity for workers to participate in the identification and control of hazards at their job site. The purpose of planned health, safety and environmental inspections is to identify hazard sources, substandard conditions and practices, address hazards, ensure continued compliance with applicable hazard controls that are expected to be in place as well as assess compliance to government regulations and other CPES standards.

1. Inspections can be formal or informal based on CPES's inspection protocol (see Section 9 Inspections for more information).
2. Formal inspections must be documented.
3. CPES has several inspection protocols available to address the needs of our operations:
 - a. Facility Inspection – CF-S-49
 - b. Worksite Safety Inspection – CF-S-19
 - c. Office Inspection – CF-S-52

Audits are used to evaluate the effectiveness and suitability of meeting planned objectives. Audits may be used to evaluate processes or systems. HSE System audits evaluate the suitability and effectiveness of the HSE System in meeting internal, customer and regulatory requirements.

Audits may be conducted by internal resources or by accredited third party organizations. Internal audits serve to promote continuous improvement of processes and systems, while external audits provide assurance to customers, regulators, and other interested parties.

Audits are documented and offer suggestions and/or recommendations for improvement. Audits and their results are a part of the management review and corrective action planning process.





1.0 Audit Schedule Guidelines






CPES will evaluate the implementation and effectiveness of HIAC as part of a planned measurable process and as per the following schedule:



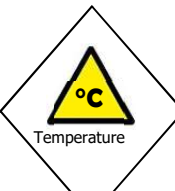

- a) 3 months after initial implementation of HIAC (Company-wide, Business Unit and/or process)
- b) During annual HSE Management System Evaluations
- c) During HSE Evaluations (CF-S-50)
- d) Review CPES's formal task hazard analysis (THA) inventory every 5 years or as changes occur (e.g., new business line added)

CPES has identified 13 (thirteen) hazard sources for the work we perform. Table 2.5.1 provides examples of hazards associated with the activities that we perform. Table 2.5.2 (template) may be utilized to identify division/pillar specific hazards and tasks associated to each hazard source.

Table 2.5.1 **Examples** of Hazards Associated with Hazard Sources

Hazard Source	Examples of Hazards Associated to Hazard Source	Task Inventory
 <p>Biological</p>	<ul style="list-style-type: none"> • Mould/Mold • Hanta Virus • Blood Borne Pathogens (Hepatitis, HIV) • Flu – H1N1, COVID-19 	<ul style="list-style-type: none"> • Demolition • Maintenance – field facilities • Office maintenance • Administering 1st aid • Shared kitchen facilities • Washrooms • Waste Management
 <p>Chemical</p>	<ul style="list-style-type: none"> • Controlled Products (Acid, Methanol, Gasoline) • Heavy Metals • Mercury • Lime 	<ul style="list-style-type: none"> • Refueling • Cleaning • Coating – application / removal • Pickling • Welding • Concrete Work • Waste Management
 <p>Electrical</p>	<ul style="list-style-type: none"> • Overhead Power Lines • Underground Power Lines • Electrified System (Transformers, Power Cords) • Powered Tools • Lightning 	<ul style="list-style-type: none"> • Pipelining • Excavation • Servicing live equipment • Tie ins • Temporary power • Generators • Burn Piles • Power Isolation • Lock Out/ Tag Out
 <p>Flammable/Explosive</p>	<ul style="list-style-type: none"> • Live/ Operating Facilities • Flammable Gas • Flammable Liquids • BTEX (Benzene, Toluene, Ethylbenzene, Xylene) • Stored fuel sources (Gasoline, Propane, Acetylene) • Trapped Gas (Natural Gas, H2S) • Pyrophoric Materials (Iron Sulphide) 	<ul style="list-style-type: none"> • Refueling • Working in proximity live customer facilities • Working in ditches • Abandonments • Plant Turn Arouns • Valve and plant maintenance • Building Entry • Atmospheric Monitoring • Purging



Hazard Source	Examples of Hazards Associated to Hazard Source	Task Inventory
 <p>Gravity</p>	<ul style="list-style-type: none"> • Hoisting Loads • Suspended Loads • Trenches/Excavations • Icy/ Slippery Conditions • Fall-to-lower level 	<ul style="list-style-type: none"> • Pipe laying • Working in Trenches • Overhead • Manual lifting • Working at heights • Slippery / muddy locations • Working on slopes • Stacking and storage • Load securement • Hoisting/ Rigging • Suspended Loads
 <p>Mechanical</p>	<ul style="list-style-type: none"> • Rotating Equipment • Pulley systems • Cranes, booms • Heavy Equipment • Welding Positioners 	<ul style="list-style-type: none"> • Replacing belts / servicing • Hand tools – grinders, drills, • Equipment Maintenance • Paper Shredding • Welding Operations • Millwright Work • Lock Out/ Tag Out
 <p>Motion</p>	<ul style="list-style-type: none"> • Mobile Equipment • Traffic - Vehicle • Human (Ergonomics, Walking) • Moving Loads • Swinging Loads • Load Securement 	<ul style="list-style-type: none"> • Laboring around moving equipment • Paper shredding • Driving • Backing up • Spotting • Manual Lifting • Positioning Equipment/ MODS/ Pipe • Lock Out/ Tag Out
 <p>Nature</p>	<ul style="list-style-type: none"> • Wildlife (Snakes, Spiders, Bears, Moose, Deer, etc.) • Weather Conditions (Rain, Wind, Snow, Fog, Lightning, etc.) 	<ul style="list-style-type: none"> • Driving • Walking right of ways • Pipelining • Pigging lines • Cleaning locations • Surveying
 <p>Noise</p>	<ul style="list-style-type: none"> • Equipment (Air Compressor, Compactors, Yellow Iron) • Compressor Buildings • Tools (Jack Hammers, Grinders) • Explosions • Pile Driving • Plant ESD (Emergency Shut Down) • Vibration 	<ul style="list-style-type: none"> • Operating equipment • Welding • Grinding • Sand blasting • Alarm horns • Fabrication in shop • Music in shop • Installing Compressors • Hydro Vac'ing





Hazard Source	Examples of Hazards Associated to Hazard Source	Task Inventory
	<ul style="list-style-type: none"> • Pressurized/ Energized Lines • Compressed Gas / air • Hydraulic Systems • Low Pressure Systems • Vacuum • Stored Energy • Boomers 	<ul style="list-style-type: none"> • Turnarounds • Welding • Removal of lines • Opening vessels / lines • Shrinking sleeves • Transporting pressurized bottles/cylinders • Hydraulic lines • Lock Out/ Tag Out • Purging
	<ul style="list-style-type: none"> • Radiography (X-ray) • Naturally Occurring Radiation Materials (NORM) • Sun • Arc Flash • Densimeter (Compaction Testing) • Microwave • Radio Waves 	<ul style="list-style-type: none"> • Integrity Testing • Cleaning vessels • Tie-ins • Pipeline repairs • Removing breakers • Opening panels • Working outdoors • Compaction Testing • Welding
	<ul style="list-style-type: none"> • Hot Surfaces (Pipes, motors, torches) • Hot Stress • Cold Stress • Steam release • Welding/Grinding Slag (molten steel) • Hot fluids (produced H₂O) • Cold fluids (liquid nitrogen, CO₂) 	<ul style="list-style-type: none"> • Welding • Preheating • Stress relief • Working outdoors in summer / winter • Inside adjacent to high heat sources • Working at elevated heights • Confined Space
	<ul style="list-style-type: none"> • H₂S • Benzene • O₂ Deficient Atmosphere • SO₂ • CO₂ • Lead • Welding Fumes • Silica • Asbestos 	<ul style="list-style-type: none"> • Vessels • Ditch work • Tanks • Purging • Confined space entry • Facility maintenance – Live / abandoned • Demolition • Office Maintenance • Welding • Sandblasting • Smoking




Human Factors is the science to determine factors that affect human performance. Human performance is the outcome of what a person does, (e.g., workplace design, procedure design and behavioural factors).

CPES has identified nine (9) human factors as considerations when completing the HIAC process. Table 2.6.1 provides examples of human factors that should be considered when planning activities. The human factors listed are not in priority sequence.

Table 2.6.1 Human Factors

	Human Factors	Considerations
	<p>Risk Tolerance</p> <ul style="list-style-type: none"> • Personal experience • Age • Education • Training • Complacency 	<ul style="list-style-type: none"> • Accepted practices at other locations • Demographics • Societal cultures • Societal tolerances • Hesitation to seem afraid • Excessive emphasis on productivity • Pressure from superiors • Lack of awareness of the risks • Overconfidence in safety systems • Work history • Self-destructive behaviors • Substance abuse • Leadership
	<p>Fit for Duty</p> <ul style="list-style-type: none"> • Drug and Alcohol • Fatigue • Wellness • Mental Health 	<ul style="list-style-type: none"> • Hours and days of work • Temperature • Working conditions • Work schedule and shift rotation • Early in the morning or late at night • Individuals doing more sedentary jobs than they are used to • Repetitive tasks • Stress - Divorce, death in family, money issues, relocation. • Stress – Workload, workplace • Addictions • Medications, prescriptions and over the counter • Insomnia, sleep apnea and other sleep disorders • Residual effects of drugs or alcohol • Drug or medication interactions • Medical conditions • Misuse of caffeine or energy drinks • Fear of letting others down by being absent

	Human Factors	Considerations
	<p>State of Mind (Emotion)</p> <ul style="list-style-type: none"> • Distracted • Focused • Psychology 	<ul style="list-style-type: none"> • Distraction of holiday seasons or time just before or after breaks • Private life concerns (monitory, family, job instability) • Mental health conditions (depression, anxiety, etc.) • Interpersonal conflicts • Distraction by specific task • Distraction by Cellular phone or electronic devices
	<p>Senses</p> <ul style="list-style-type: none"> • Smell • Vision (Illumination) • Hearing • Touch • Taste 	<ul style="list-style-type: none"> • Color confusion • Hearing degeneration • Past injuries • Corrective lenses • Accents and vernacular inconsistencies • Odor tolerance/ inability to differentiate • Desensitization • Depth perception • Overpowering of senses
	<p>Communication Skills</p> <ul style="list-style-type: none"> • Written • Verbal • Hand signals • Communication Avenues – radio systems, cellphones, email 	<ul style="list-style-type: none"> • Literacy/illiteracy • Language barriers • Trade names, technical language • Communicating in challenging environments • Lack of competency with communication equipment • Illegible writing and notes • Failure to follow or understand communication systems (i.e. Lockout) • Fear of speaking out or in groups • Inconsistent or lack of knowledge of the hand signals used in the operation
	<p>Comprehension</p> <ul style="list-style-type: none"> • Education • Previous schooling • Personality type 	<ul style="list-style-type: none"> • Words with multiple meanings • Language barriers • Misunderstanding • Technical language • Use of slang • Use of symbols • Use of acronyms – industry and personal

	Human Factors	Considerations
	<p>Culture</p> <ul style="list-style-type: none"> • Organizational • Previous Company experience • Ethnic background • Accountability 	<ul style="list-style-type: none"> • Leadership • Safety Culture – Compliance, Reactive, Proactive • Demographics • Societal cultures • Societal tolerances • Inappropriate reward structures • Desire to be accepted • Desire to please customers • Aversion to questioning authority • Past encouragement for risk taking
	<p>Ergonomics</p> <ul style="list-style-type: none"> • Workplace design • Human/Machine interface 	<ul style="list-style-type: none"> • Different body types • Different strength levels • Repetitive motions • Driving for long periods
	<p>Competency</p> <ul style="list-style-type: none"> • Knowledge • Skill • Desire • Understanding of job requirements 	<ul style="list-style-type: none"> • Past experience • How long has it been since the task was last performed? • Fear of admitting lack of knowledge • Desire to please supervisor and coworkers • Not knowing what you don't know • Not having all the facts before deciding competency • Desire outweighing skill • Verification

Appendix 1 Regulatory Clarifications and Review

The following are excerpts from the Provincial and Federal Occupational Health and Safety Act, Regulation and Code. This information is relevant with respect to HIAC.

A. Employer Roles and Responsibilities – Alberta

An employer includes any company with one or more employees. This applies to all contractors or small businesses that have one or more people doing work at the project whether they are employees, owner-operators or self-employed workers.

Under OHS legislation, employers must make every reasonable effort to ensure the health and safety of their workers and other workers working for them, and ensure that those workers are aware of their responsibilities. This includes:

- Providing the workers with the information they need to do their job safely, e.g., location of power lines, safe limits of approach.
- Establishing safe work procedures and ensuring they are followed, e.g., working in proximity to energized power lines.
- Ensuring that equipment is maintained in safe working conditions, e.g., boom truck controls.

B. Worker Roles and Responsibilities – Alberta

A worker is any person engaged in an occupation while in the service of an employer.

Under OHS legislation, workers must take reasonable care to protect the health and safety of themselves and other workers present at a work site. This includes:

- Cooperating with their employer for the purpose of protecting themselves and others, e.g., following safe work procedures.
- Participating in training provided by the employer, and applying the training.
- Complying with OHS legislation.

C. Supplier Roles and Responsibilities – Alberta

A supplier is required to ensure (as far as reasonably practicable) that any tool, appliance or equipment it supplies is in safe operating condition. In addition, a supplier must ensure that the substances or hazardous materials they supply are in compliance with the OHS Act, Regulation and Code.

D. Contractors Who Direct Activities of Other Employers – Alberta

Every contractor who directs the activities of other employers (one or more) at a work site shall ensure (as far as reasonable practicable) that the other employer(s) comply with the Act, Regulation and Code.

E. Prime Contractor: Provincial Clarification

The term prime contractor is also referenced in the same legislation; however there are jurisdictional differences that need to be addressed as part of HIAC.

Alberta: Every work site must have a prime contractor if there are two (2) or more employers involved in work at the work site at the same time. The prime contractor for a work site is the contractor, employer or other person who enters into an agreement with the owner of the work site to be prime contractor, If no agreement has been made or if no agreement is in force than the owner is prime contractor. The prime contractor shall ensure, as far as reasonably practicable to do so, that the Alberta Occupational Health and Safety Act and the regulations are complied with in respect of the work site.

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Saskatchewan: A prime contractor is responsible for coordinating the health and safety activities at multi-employer worksites. Their duties include ensuring policies, procedures, and safe work practices are used on the worksite; and preparing a written plan that coordinates activities and identifies the prime contractor's backup and the supervisors on the worksite. A prime contractor is designated by the project owner or is the owner of the project.

British Columbia: A prime contractor is required for a workplace in which workers of one employer are working at the same time. The prime contractor must ensure that the activities of all other employers and their workers on the worksite are coordinated as related to health and safety, and in completed with the British Columbia Occupational Health and Safety Act and regulation.

Manitoba: The owner of the construction project site is considered to be the prime contractor unless other arrangements have been made. A prime contractor is responsible to ensure that everyone involved in work at the project meets their legal safety and health obligations. A prime contractor coordinates, organizes and monitors work to ensure reasonable and practical precautions are in place to effectively control safety and health hazards. Additionally a prime contractor coordinates the safety and health programs on contracted employers.

Ontario: In Ontario, the term constructor is used.

The constructor for a project shall ensure that each prospective contractor and subcontractor for the project has received a copy of the list referring to all designated substances that are present at the site before the perspective contractor or subcontractor enters into a binding contract for the supply of work on the project. Additionally, a constructor shall that the measures and procedures prescribed by this Act and the regulations are carried out on the project; every employer and worker performing work on the project complies with this Act and the regulations; the health and safety of workers on the project is protected.

Northwest Territories (NWT): In NWT, the term principal contractor is used.

A principal contractor shall coordinate the activities of the employers in the establishment to ensure the health and safety of persons in the establishment.

F. Roles and Responsibilities by Provincial Jurisdictions

- Saskatchewan OHS Act, Chapter 2 – Actions for Employers to Ensure OHS Due Diligence.
- Alberta OH&S Act, Code & Regulations, Part 2 – Hazard Assessment, Elimination and Control.
- British Columbia OH&S Regulations, Chapter 2 – Actions for Employers to Ensure OHS Due Diligence and Parts 5-19 General Hazard Requirements.
- Manitoba Workplace Safety & Health Act, Sections 4-7 – Duties of Employers, Supervisors, Workers, Self-Employed Person, Prime Contractors and Contractors.
- Ontario OH&S Act, Part 3 – Duties of Employers and Other Persons.
- Northwest Territories Safety Act, Sections 4-7 – Duties of Employers, Workers, Suppliers and Health and Safety Committee Members.

G. Hazard Assessment and Controls Code References

OHS legislation in each jurisdiction specifies requirements for identifying, assessing and controlling workplace hazards. In Alberta Part 2 of the Occupational Health and Safety Code describes these requirements.

Hazard Assessment

- 7(1) An employer must assess a work site and identify existing and potentials hazards before work begins at the work site or prior to the construction of a new work site.

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- 7(2) An employer must prepare a report of the results of a hazard assessment and the methods used to control or eliminate the hazards identified.
- 7(3) An employer must ensure that the date on which the hazard assessment is prepared or revised is recorded on it.
- 7(4) An employer must ensure that the hazard assessment is repeated.
 - a. At reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions,
 - b. When a new work process is introduced;
 - c. When a work process or operation changes, or
 - d. Before the construction of significant additions or alterations to a work site
- 7(5) A prime contractor must ensure that any employer on a work site is made aware of any existing or potential work site hazards that may affect that employer's workers.

Worker Participation

- 8(1) An employer must involve Affected workers in the hazard assessment and in the control or elimination of the hazards identified.
- 8(2) An employer must ensure that workers affected by the hazards identified in a hazard assessment report are informed of the hazards and of the methods used to control or eliminate the hazards.

Hazard Elimination and Control

- 9(1) If an existing or potential hazard to workers is identified during a hazard assessment, an employer must take measures in accordance with this section to:
 - a. Eliminate the hazards, or
 - b. If elimination is not reasonably practicable, control the hazard.
- 9(2) If reasonably practicable, an employer must eliminate or control a hazard through the use of engineering controls.
- 9(3) If a hazard cannot be eliminated or controlled under subsection (2), the employer must use administrative controls that control the hazard to a level as low as reasonable achievable.
- 9(4) If the hazard cannot be eliminated or controlled under subsections (2) or (3), the employer must ensure that the appropriate personal protective equipment is used by workers affected by the hazard.
- 9(5) If the hazard cannot be eliminated or controlled under subsections (2), (3) or (4), the employer may use combination of engineering controls, administrative controls or personal protective equipment if there is a greater level of worker safety because a combination is used.

Emergency Control of Hazard

- 10(1) If emergency action is required to control or eliminate a hazard that is dangerous to the safety or health of workers,
 - a. Only those workers competent in correcting the condition, and the minimum number necessary to correct the condition, may be exposed to the hazard, and
 - b. Every reasonable effort must be made to control the hazard while the condition is being corrected.
- 10(2) Sections 7(2) and 7(3) do not apply to an emergency response during the period that emergency action is required.

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Health and Safety Plan

- 11 If ordered to do so by a Director, an employer must prepare and implement a health and safety plan that includes the policies, procedures and plans to prevent work site incidents and occupational diseases at the work site.

Hazard assessment requirements are also found in other specific sections outside of part 2 of the Alberta Occupational Health and Safety Code. They are:

- **Part 4 Chemical Hazards, Biological Hazards and Harmful Substances**
 - Refers to the use of safe work practices based on the hazard assessment when developing an exposure control plan.
- **Part 5 Confined Spaces**
 - Requires an employer to appoint a competent worker to complete a hazard assessment utilizing specific criteria.
 - Refers to specific requirements if the hazard assessment identifies a potential atmospheric hazard.
 - If the hazard assessment identifies hazards outside of oxygen concentration and substances listed in schedule 1, table 2, and a tending worker is required.
- **Part 9 Fall Protection**
 - Refers to the requirement of a hazard assessment being conducted if an employer is using procedures in place of fall protection equipment.
- **Part 10 Fire and Explosion Hazards**
 - Refers to the hazard assessment in the classification of work sites, should the work area be determined a hazardous location, and a review of the classification should future hazard assessments indicate a change.
 - Hazard assessment is referred to in the procedures and precautions section.
- **Part 14 Lifting and Handling Loads**
 - Requires the employer to perform a hazard assessment that considers specific criteria if a worker is to manually lift, lowers, pushes, pulls, carries, handles or transports a load that could injure the worker.
- **Part 15 Managing the Control of Hazardous Energy**
 - Requires an employer to conduct a hazard assessment prior to initiating a complex group control process to identify and locate hazardous energy sources.
- **Part 18 Personal Protective Equipment**
 - If the hazard assessment indicates the need for Personal Protective Equipment, the employer must ensure certain criteria are met.
 - Refers to the requirements for breathing equipment if dealing with an immediate danger.
- **Part 19 Powered Mobile Equipment**
 - Should a hazard assessment indicate a significant possibility of injury to the operators from flying or projecting objects or the possibility of rollover, adequate protection must be provided.
- **Part 27 Violence**
 - This part informs employers that workplace violence is considered to be a hazard for the purpose of Part 2.
- **Part 37 Oil and Gas Wells**
 - Refers to the requirements of the breathing equipment based on the hazard assessment.
 - Refers to allowing a worker to be within the danger zone of the rotary table only during non-drilling operations and only once a hazard assessment has been completed.

In addition to comply with Provincial and Federal OH&S legislation employers should consider due diligence when planning and conducting work.

H. Reasonably Practicable

Keep in mind that the works reasonable and practicable differ from the overall concept of “reasonably and practicable.”

Reasonable is based on sound judgement or logic; you can measure if something is reasonable by examining its risks and then determining if the steps taken will reduce risks to an acceptable level.

Practicable means that something can be done or that something is possible regardless of cost or level of difficulty. Reasonable, unlike practicable, allows for cost considerations.

“Reasonably practicable” combines the two definitions and thus results in a high standard of responsibility. If you comply with OHS legislation and industry accepted standards, you will be operating only at the minimum of what is considered reasonable practicable. Ultimately, you need to consider whether the control measures you take adequately protect the health and safety of workers.

I. Due Diligence

Due Diligence is the level of judgement, care, prudence, determination, and activity that a person would reasonable be expected to do under particular circumstances. It describes those activities that address a person’s compliance with assigned duties and responsibilities. The demonstration of due diligence is likened to the proof is in the pudding concept and can be challenged after an incident occurs. Due diligence is doing everything that is reasonably practicable under the circumstances.

The term all reasonable care is synonymous with due diligence. This involves determining what a reasonable person would have done in the circumstances. Due diligence includes the review of the following criteria.

- Foreseeability – Could it have been foreseen that something could go wrong?
- Preventability – Was there an opportunity to prevent the incident?
- Control – Who was present who could have prevented the incident?

Recent decisions in Canada and the USA have resulted in substantial fines for organizations and individuals who did not demonstrate due diligence in providing a safe work environment for employees.

The basic considerations of the courts include:

- Plan – Is there a plan with the inherent risks in the workplace and manage them effectively to minimize workplace injuries and illnesses?
- Adequacy – Is the plan that is in place adequate to meet the needs of the organization and its employees?
- Implementation – Is there evidence that the plan has been implemented?
- Monitoring – Is there a monitoring process (audits, evaluations, inspections, etc.) by competent staff to ensure that requirements of the plan are being met?

Accordingly, these court considerations should be incorporated into a company’s HIAC Program to meet due diligence requirements. Equally important, the HIAC Program should have a “Feedback” component to verify the adequacy of the overall program and facilitate corrective or improvement measures.

J. Demonstrating Due Diligence

A company that demonstrates due diligence does so by virtue of a planned program and effective management of health, safety and environment issues on a daily basis.

Due diligence responsibilities start with regulatory compliance (a minimum requirement) however, minimum compliance yields minimum safety.

One reference which is often overlooked in the OHS legislation is Part 1. Section 3 of the Code (Adoption of Standards).

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This section identifies approximately 165 standards and must be reviewed (and complied with) in relation to the company's operations.

Specific due diligence responsibilities are included (but are not limited to) in the following table:

Due Diligence Responsibilities	
Role	Responsibilities
Employers Plan, Adequacy, Implementation and Monitoring	<ul style="list-style-type: none"> • Establish a program <ul style="list-style-type: none"> ○ Systematically identify hazards and assess their risks ○ Include plans within the program to manage those risks; this should reduce the likelihood of hazards causing harm. • Ensure the program is adequate <ul style="list-style-type: none"> ○ Program must meet the needs of the workplace and workers ○ Compare the program with industry standards • Monitor and evaluate program effectiveness <ul style="list-style-type: none"> ○ Regularly check the effectiveness of the program ○ Judge how well it meets regulator requirements
Employees	<ul style="list-style-type: none"> • Comply with regulatory requirements, employer rules, and industry standards • Follow established safe work practices and procedures • Recognize and report hazards to the employer • Use appropriate PPE and safety equipment • Report all injuries or exposures to hazardous materials to the employer

K. References

Alberta Construction Safety Association (ACSA). (2011). Chapter 1 - Regulatory Requirements & Roles and Responsibilities, *Hazard Management*, 1-3 - 1-20.