



Western Stevedoring
Lynnterm
2019 Edition
Health & Safety Management System

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0.0 Document Overview

The Western Stevedoring HSMS Edition 2019 is written to be generally compliant to ISO Standard 45001:2018, and supersedes any prior HSMS. The official copy of the Western Stevedoring HSMS Edition 2019 is stored and maintained electronically.

1.0 Scope

The scope of this HSMS is limited to the risks to workers and other relevant interested parties operating within Lynnterm and the Stevedoring Division.

The HSMS (Health and Safety Management System) encompasses the processes by which management establishes and communicates HSMS expectations and commitment, ensures the availability of adequate resourcing and ensures accountability for performance at all levels of the organization.

This document outlines the HSMS, and gives guidance for its use, to enable Western Stevedoring to provide safe and healthy workplaces by preventing work-related injury and ill health, as well as by proactively improving its OH&S performance.

The goal of the HSMS is to improve occupational health and safety, eliminate hazards and minimize OH&S risks (including system deficiencies), take advantage of OH&S opportunities, and address OH&S management system nonconformities associated with its activities.

Consistent with the organization's HSQE (Health & Safety, Quality & Environment) Policy, the intended outcomes of this HSMS include:

- a) Continual improvement of OH&S performance;
- b) Fulfilment of legal requirements and other requirements; and
- c) Achievement of OH&S objectives.

This document is applicable to the OH&S risks under the organization's control, taking into account factors such as the context in which the organization operates and the needs and expectations of its workers and other interested parties.

2.0 Normative References

There are no normative references in this document.

3.0 Terms and Definitions

For the purposes of this document, the following terms and definitions apply.

ACCIDENT	An undesired event that results in harm to people; damage to property or the environment; or loss to process.
ALERT BULLETIN	A communication issued by the HSQE Department immediately after a significant incident to avoid the recurrence of a similar incident, or as a means of conveying significant events.
AUDIT	<p>A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.</p> <p>An audit can be an internal audit (first party) or an external audit (second party or third party), and it can be a combined audit (combining two or more disciplines).</p> <p>An internal audit is conducted by the organization itself, or by an external party on its behalf.</p> <p>“Audit evidence” and “audit criteria” are defined in ISO 19011.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
BCMEA	<p>British Columbia Maritime Employers Association</p> <p>An industry association chartered with providing advocacy and support for customer members in all areas of labour relations. They advise on labour legislation and regulations, training, health and safety, human resources, employment equity and communications.</p>
CERTIFICATION	Formally attesting a fact of fulfillment of requirements.
CHANGE	Any equipment modification other than "replacement in kind", any change in materials or a shift in operations to conditions outside the established process or mechanical design envelope.
COHS	Canadian Occupational Health and Safety Regulations (Made under the Canada Labour Code Part II)
COLD WORK	Any work where a potential source of ignition does not exist. The opposite of “Hot Work”.

COMMUNITY	Stakeholders affected by terminal operations, distribution and stevedoring operations. Emphasizes communities, government agencies, emergency responders, media who report on operations/incidents, area businesses and schools.
COMPETENCE	Ability to apply knowledge and skills to achieve intended results. This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.
COMPLIANCE	Meeting legal, company and/or regulatory requirements.
CONFINED SPACE	An enclosed or partially enclosed space having restricted access and egress and due to its design, location, or service may become hazardous to a worker entering it. This includes any excavation which exceeds a depth of 1.5 meters (4.8 feet).
CONFORMITY	Fulfilment of a requirement. This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.
CONSEQUENCE	A measure of the expected effect of an incident.
CONSULTATION	Seeking views before making a decision. Consultation includes engaging health and safety committees and workers' representatives, where they exist.
CONTINUAL IMPROVEMENT	Recurring activity to enhance performance. Enhancing performance relates to the use of the OH&S management system in order to achieve improvement in overall OH&S performance consistent with the OH&S policy and OH&S objectives. Continual does not mean continuous, so the activity does not need to take place in all areas simultaneously. This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.
CONTRACTOR	External organization providing services to the organization in accordance with agreed specifications, terms and conditions. Services may include construction activities, among others.
CORE TRAINING	Basic training that is central or most important to a particular job position, or group of job positions performing similar functions.

CORRECTIVE ACTION	<p>Action to eliminate the cause(s) of a nonconformity or an incident and to prevent recurrence.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. The definition has been modified to include reference to “incident”, as incidents are a key factor in occupational health and safety, yet the activities needed for resolving them are the same as for nonconformities, through corrective action.</p>
CRITICAL	<p>A designation used to differentiate that which is vital to the prevention or mitigation of a major event such as an uncontrolled emission, fire or explosion that poses serious danger to people, property or the environment. Usually associated with equipment, procedures or systems used for the control of major hazards.</p>
CRITICAL ACTIVITIES	<p>Tasks that, if not completed to a required standard would have a higher probability of causing an incident and/or could produce a more serious incident.</p>
CUSTOMER	<p>Any third party who has a financial stake relating to the receipt, transfer and/or delivery of cargo. These include shippers, receivers, land transportation providers and shipping lines</p>
DESIGNATE	<p>Positions which are empowered to make specified decisions.</p>
DOCUMENTED INFORMATION	<p>Information required to be controlled and maintained by an organization and the medium on which it is contained.</p> <p>Documented information can be in any format, any media, and from any source.</p> <p>Documented information can refer to:</p> <ul style="list-style-type: none"> a) The management system, including related processes; b) Information created in order for the organization to operate (documentation); or c) Evidence of results achieved (records). <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
DUE DILIGENCE	<p>Taking all reasonable measures to protect employees, the public and the environment. Due Diligence applies to EVERYONE - Management, Supervision and Employees.</p>

EFFECTIVENESS	<p>Extent to which planned activities are realized and planned results achieved</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
EH&S	Environment, Health and Safety
EMPLOYEES	Western Stevedoring employees and contract personnel.
ERP	Emergency Response Plan
ERP MANUAL	The manual containing details of the Emergency Response Plan.
EVALUATION	An in-depth evaluation of the procedures, plans and management systems that have been developed by the unit to meet the requirements of HSMS Elements. An Internal Evaluation is conducted by a team from the site. An External Evaluation is conducted by a multi-discipline team from outside the site.
FACILITY	Facilities may refer to the equipment, structures and other hardware for which a unit is responsible.
FIRST AID INJURY	A minor injury requiring only first aid treatment, normally given by someone other than a physician.
FUNCTION	An organization with an assigned duty or role for a specific activity such as the Terminal or Ship Loading organization which manages the transportation of products.
GAS TESTER	A Western Stevedoring employee who is certified to conduct gas tests.
HAZARD	A chemical or physical condition that has the potential for causing harm to people, property or the environment.
HAZARD ANALYSIS	The organized and systematic process of defining what can happen to lead to an event involving the hazard.

HAZARD PREVENTION PROGRAM (HPP)	<p>A program for the prevention of hazards, including ergonomics related hazards, in the workplace that is appropriate to the size and nature of the hazards.</p> <p>This program is mandated by COHS Par XIX and MOHS Part 7 and includes the following components:</p> <ul style="list-style-type: none"> - Develop and implementation plan that specifies a timeframe for the implementation of the program. - Identify the hazards. Establish a record of hazards. - Assess the level of risk. - Select the preventative measures to be implemented. Develop a preventative maintenance program. Assess the impact of these measures on the workplace. - Develop a plan to implement the selected preventative measures and monitor progress. - Provide employees with education on the Code and Regulations and on hazards and preventative measures. - Program review. - Report. <p>This program is evidenced through documented Risk Hazard Assessments, Job Hazard Analysis, and Standard Operating Procedures.</p>
HEALTH HAZARD ASSESSMENT	<p>The characterization of the potential adverse health effects resulting from human exposure to workplace or environmental health hazards (quantification of health effects based on epidemiological, clinical, toxicological and environmental evidence and assessment of the extent of health effects in individuals and populations based on assessments of exposure).</p>
HOT WORK	<p>Work where there is a potential for a source of ignition. Example: Welding, Grinding, Cutting with Torch etc.</p>
HSMS EXTERNAL EVALUATION	<p>An in-depth evaluation of the procedures, plans and management systems that have been developed by the site to meet the requirements of the HSMS Elements. Conduction by a third party.</p>
HSMS INTERNAL EVALUATION	<p>An in-depth evaluation of the procedures, plans and management systems that have been developed by the site to meet the requirements of the HSMS Elements. Conducted annually by personnel from the company.</p>
HSMS ELEMENT OWNER	<p>The person designated to be responsible for ensuring continuous and ongoing compliance, review and stewardship of an HSMS Element.</p>

ICS	Incident Command System
IH	Industrial Hygiene
INCIDENT	An undesired (downgrading) event which did result in, or under slightly different circumstances could have resulted in, an unwanted impact on the safety or health of people, property or the environment (i.e., near miss, nonconformance etc.).
INJURY	Adverse effect on the physical, mental or cognitive condition of a person. These adverse effects include occupational disease, illness and death. The term “injury and ill health” implies the presence of injury or ill health, either on their own or in combination.
INSPECTION	Organized examination of all conditions, equipment, and practices in the workplace in order to identify hazards and take corrective actions, done on a regular basis.
INTERESTED PARTY	<p>Person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
JHSC	Joint Health and Safety Committee. Its role is to support and monitor Safety, Health and Loss Control Education and Promotion Programs for all employees.
KEY POSITION	Those positions which can have a significant impact on the safety, health and environment performance.
LEGAL REQUIREMENTS	Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with. For the purposes of this document, legal requirements and other requirements are those relevant to the OH&S management system. “Legal requirements and other requirements” include the provisions in collective agreements. Legal requirements and other requirements include those that determine the persons who are workers’ representatives in accordance with laws, regulations, collective agreements and practices.
LOST TIME INJURY	A work injury which prevents a person from performing a regularly established job for one or more full work days beyond the day of the accident (also referred to as a Disabling Injury).

LTI INDEX/LTIF	<p>Lost Time Injury Index $\text{No. of (Lost Time Injuries) x 200,000}$ Total Worker Exposure Hours 200,000 hours represents 100 people working for one year.</p>
LTIS INDEX	<p>Lost Time Injury Severity Index $(\text{No. of Lost Time Days}) \times 200,000$ Total Worker Exposure Hours 200,000 hours represents 100 people working for one year.</p>
MANAGEMENT SYSTEM	<p>Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives. A management system can address a single discipline or several disciplines. The system elements include the organization's structure, roles and responsibilities, planning, operation, performance evaluation and improvement. The scope of a management system may include the whole of the organization, specific and identified functions of the organization, specific and identified sections of the organization, or one or more functions across a group of organizations.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
MANDATORY TRAINING	<p>Training that must be completed to fill or hold a given position and consists of either Certification and/or Non-Certification courses.</p>
MANUAL HOLDER	<p>The person designated by position to assume the responsibility for a manual and its upkeep including the approved revisions.</p>
MANWATCH	<p>The first line of communications to initiate emergency procedures during a confined space entry. Has authority over all activities within the confined space.</p>
MEASUREMENT	<p>Process to determine a value.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
MEDICAL AID (MA)	<p>An injury/occupational illness requiring medical attention only, without lost time from work.</p>

MINIMUM REQUIRED SAFETY EQUIPMENT	Absolute minimum personal protective equipment required to work on site, (excluding offices) i.e., safety glasses, steel-toed boots hi-vis vests, personal flotation devices, etc.
MOHS	Maritime Occupational Health and Safety Regulations (Made under the Canada Labour Code Part II).
MONITORING	<p>Determining the status of a system, a process or an activity. To determine the status, there may be a need to check, supervise or critically observe.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
MSDS/SDS	(Material) Safety Data Sheet. A document disclosing information about the proper and safe use, storage, manufacturing and handling of a potentially hazardous substance, including information relating to its toxicological properties and potential health hazards.
NEAR-MISS (NM)	Any incident that could have likely resulted in personal injury or damage to a facility, community or the environment.
NON-CONFORMITY	<p>Non-fulfilment of a requirement. Nonconformity relates to requirements in this document and additional OH&S management system requirements that an organization establishes for itself.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
NON-ROUTINE PROCEDURES	Procedures that are used for non-routine tasks or for high risk jobs.
NON-ROUTINE TASKS	Tasks that are done infrequently or for high risk jobs.
OBJECTIVE	<p>Result to be achieved. An objective can be strategic, tactical, or operational. Objectives can relate to different disciplines (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process. An objective can be expressed in other ways, i.e., as an intended outcome, a purpose, an operational criterion, as an OH&S objective, or by the use of other words with similar meaning (i.e., aim, goal, or target).</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>

OH&S MANAGEMENT SYSTEM (HSMS)	Management system or part of a management system used to achieve the OH&S policy. The intended outcomes of the OH&S management system are to prevent injury and ill health to workers and to provide safe and healthy workplaces.
OH&S PERFORMANCE	Performance related to the effectiveness of the prevention of injury and ill health to workers and the provision of safe and healthy workplaces.
OH&S POLICY	Policy to prevent work-related injury and ill health to workers and to provide safe and healthy workplaces.
OH&S OBJECTIVE	Objective set by the organization to achieve specific results consistent with the OH&S policy.
OH&S OPPORTUNITY	Circumstance or set of circumstances that can lead to improvement of OH&S performance.
OH&S	Occupational Health and Safety
OPERATION	Any activity involving the storage or movement of a material. Also, the utilization of resources by a "Unit" to produce an output.
ORGANIZATION	<p>Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives. The concept of organization includes, but is not limited to sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
OUTSOURCE	<p>Make an arrangement where an external organization performs part of an organization's function or process. An external organization is outside the scope of the management system, although the outsourced function or process is within the scope.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
OVERVIEW	A general or comprehensive view of the purpose and objectives of a particular subject.

PARTICIPATION	Involvement in decision-making. Participation includes engaging health and safety committees and workers' representatives, where they exist.
PERFORMANCE	<p>Measurable result. Performance can relate either to quantitative or qualitative findings. Results can be determined and evaluated by qualitative or quantitative methods. Performance can relate to the management of activities, processes, products (including services), systems or organizations.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
PERSONAL PROTECTIVE EQUIPMENT (PPE)	Equipment or clothing worn by a worker to protect them from health or safety hazards associated with working conditions on a work site (e.g., hard hats, steel-toed boots, safety glasses, leather gloves).
POLICY	<p>Intentions and direction of an organization, as formally expressed by its top management.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
PROCEDURES	The written information required to operate and maintain equipment. Includes specific operating and maintenance instructions and procedures such as operating limits, hazard to be controlled, and any other safety or health requirements.
PROCESS	<p>Set of interrelated or interacting activities which transforms inputs into outputs.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
RECORDABLE INJURY	Includes all fatalities, disabling, restricted work, and medical aid injuries.
REFRESHER	Course reviewing previous studies, or giving instruction in modern methods, updated procedures and requirements.
REGULAR MAINTENANCE	Routine maintenance not requiring special procedures or precautions.
REPLACEMENT IN KIND	A replacement which is a duplicate of the item being removed.

REQUIREMENT	<p>“Generally implied” means that it is custom or common practice for the organization and interested parties that the need or expectation under consideration is implied. A specified requirement is one that is stated, for example in documented information.</p> <p>This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.</p>
RESTRICTED WORK CASE (RWC)	When an employee who works at a permanently assigned job is injured and requires medical treatment and upon return cannot perform all of the duties normally associated with it and/or has to be re-assigned to another function which they can perform.
REVISION CONTROL RECORD	Maintained at the front of each manual indicating the amendment dates of each revision.
RISK	A measure of economic loss, human injury or environmental damage in terms of the likelihood of the incident and the consequence (magnitude of the loss or injury).
RISK ANALYSIS	The development of a qualitative or quantitative estimate of risk based on engineering evaluation and mathematical techniques for combining estimates of incident consequences and frequencies.
RISK ASSESSMENT	The process by which the results of a risk analysis are used to make decisions, either through relative ranking of risk reduction strategies or through comparison with risk targets.
RISK MANAGEMENT	The systematic application of management policies, procedures and practices to the tasks of analyzing, assessing and controlling risk in order to protect employees, the general public and the environment, as well as company assets while avoiding business interruptions.
SAFETY CRITICAL JOBS/TASKS	A specific element of work which historically has produced and/or which possesses the potential to produce major loss (people, property or process) when not properly performed. All safety critical jobs/tasks require special procedures.
TEMPORARY REPAIR	A repair made to maintain the operation of a unit until such time that a permanent fix can be made.

TOP MANAGEMENT	Person or group of people who directs and controls an organization at the highest level. Top management has the power to delegate authority and provide resources within the organization, provided ultimate responsibility for the OH&S management system is retained. If the scope of the management system covers only part of an organization, then top management refers to those who direct and control that part of the organization.
TRENCH	An elongated dug out area of ground where the depth exceeds its width at the bottom (BC OH&S).
TRI INDEX	Total Recordable Injury Index $(A+C) \times 200,000 / \text{Total Worker Exposure Hours}$ where (A) is # Fatalities and Lost Time Injuries where (C) is # of Medical Aids 200,000 hours represents 100 people working for one year.
VESSEL ENTRY	When any part of the body (head, hands, feet, etc.) breaks the plane of the opening.
WHMIS	Workplace Hazardous Material Information System
WORKER	Person performing work or work-related activities that are under the control of the organization. Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis. Workers include top management, managerial and non-managerial persons. The work or work-related activities performed under the control of the organization may be performed by workers employed by the organization, workers of external providers, contractors, individuals, agency workers, and by other persons to the extent the organization shares control over their work or work-related activities, according to the context of the organization.
WORKPLACE	Place under the control of the organization where a person needs to be or to go for work purposes. The organization's responsibilities under the OH&S management system for the workplace depend on the degree of control over the workplace.

4.0 Context of the Organization

4.1 Understanding the organization and its context

The purpose of Western Stevedoring's Health and Safety Management System (HSMS) is to protect the environment in which it operates and to ensure the health and safety of its employees, customers and the public impacted by its operations and services.

Top Management at Western Stevedoring is committed to providing a safe and healthy work environment through the use of risk hazard assessments and promoting safe work practices and behaviours within the Company.

Every person employed by Western Stevedoring has a right to a job that can be performed safely and has an obligation to work safely and to promote safe working conditions, safe work practices and to adopt a positive attitude towards incident prevention and waterfront safety.

4.2 Understanding the needs and expectations of workers and other interested parties

Western Stevedoring's interested parties and their key needs and expectations are:

Workers: a safe workplace free of dangerous work, identified and mitigated hazards, effective health and safety management system, and the ability to participate in the safety program;

Union: open lines of communication and requisite consultation regarding health and safety matters;

Customers: safe plan for the execution of their work, transparent reporting of incidents and appropriate corrective actions;

Management: safe and efficient execution of the work, participation of the workers within the safety program, incident reporting and effective corrective actions;

Regulatory: provide a compliant workplace; and

Vendors/Service Providers: a safe worksite with identified and mitigated hazards, sufficient communication to execute their work in a safe manner.

4.3 Determining the scope of the OH&S management system

The HSMS applies to all Western Group's Lynnterm and Stevedoring Division operations and encompasses the processes by which management establishes and communicates HSMS expectations and commitment, ensures the availability of adequate resourcing for the safe execution of the work, and ensures accountability for performance at all levels of the organization.

4.4 OH&S management system

This HSMS governs the processes by which efficient, safe work will be executed. The HSMS will be continuously reviewed and modified to ensure adequacy.

5.0 Leadership and worker participation

5.1 Leadership and commitment

Leadership encourages worker participation in ensuring a safe workplace while protecting their individual and collective rights; provides perspective; establishes an integrated framework; sets and communicates expectations; and provides the resources for effective, successful, and safe operations in alignment with corporate strategy and objectives.

Assurance of operations integrity requires management leadership and commitment visible to the organization, and accountable at all levels for ensuring and promoting continual improvement to achieve the required outcomes.

5.2 OH&S policy

5.2.1 Establishing the HSMS policy

Western Stevedoring has established the following integrated Health, Safety, Quality and Environment Policy:

HEALTH, SAFETY, QUALITY AND ENVIRONMENT POLICY

Western Stevedoring is a full service Terminal Operator and Stevedore headquartered in North Vancouver, British Columbia. We operate three (3) terminals in British Columbia (Lynnterm, North Vancouver; Ogden Point, Victoria; and, Cowichan Bay, Duncan), and provide shipboard stevedoring services throughout the Province.

Western Stevedoring is committed to the Health and Safety of its Employees, Customers and other stakeholders, to protecting the environment in which we operate, through pollution prevention, protection of biodiversity and ecosystems, waste reduction, and minimization of our consumption of resources, while providing our Customers with the highest level of service satisfying their Health, Safety, Quality and Environment (HSQE) requirements.

Western Stevedoring's Pulp operation is certified to ISO 9001, its Health and Safety System conforms to WorkSafeBC's Certificate of Recognition (COR) Program, and the Company's Environmental Management System will conform to ISO 14001 and 45001.

Top Management of Western Stevedoring will establish strategic direction for the Company's HSQE program and ensure that adequate resources are provided to meet the Company's HSQE obligations, including complying with applicable legal, and other requirements to which the Company subscribes, establishing appropriate and suitable HSQE objectives and targets, and establishing and overseeing a regular audit and monitoring program to ensure continual improvement of the Company's HSQE performance.

Western Stevedoring's Management Team is responsible for establishing, directing and supporting the Company's corporate strategy to ensure effectiveness, compliance, and full implementation of its HSQE program.

Supervisory personnel are provided with training to enable them to meet their obligations and responsibilities under the Company's HSQE program, consistent with applicable regulations and Company policy.

Workers are empowered to carry out their duties safely and efficiently while following applicable regulations and the Company's site specific rules and procedures, through appropriate support, supervision, training, and (two-way) communication.

This HSQE Policy is communicated to all Staff within the Company as well as to our Customers, Contractors and Suppliers, and will be available to the Public and other interested parties through selected media.

5.2.2 Communicating the HSQE policy

The HSQE Policy is communicated to all staff within the Company as well as to our customers, contractors and suppliers, and will be available to the public and other interested parties through selected media.

5.3 Organizational roles, responsibilities and authorities

Western Stevedoring top management ensures that the responsibilities and authorities for the following roles are assigned, communicated and understood in the organization:

- Division General Managers – ensure their interested parties needs are addressed through the actions of their organizations;
- Manager HSQE - ensures that the HSMS conforms to the requirements of ISO 45001:2018;
- Manager HSQE – reports on the performance of the HSMS and on opportunities for improvement (see ISO 45001:2018 sec. 10.1), in particular to top management; and
- Manager HSQE - ensures that the integrity of the HSMS is maintained when changes to the HSMS are planned and implemented.

Responsibilities and authorities are outlined and communicated through organizational charts.

5.4 Consultation and participation of workers

Worker consultation and participation in the development, planning, implementation, performance evaluation and actions for improvement are mandated regulatory components per Part XIX of the COHS, Part 7 of the MOHS, and Part II of the Canada Labour Code. Western Stevedoring ensures compliance through our JHSCs including HPP Subcommittees.

Western Stevedoring through its JHSCs provides:

a) Mechanisms, time, training and resources necessary for consultation and participation of workers;

b) Timely access to clear, understandable and relevant information about the OH&S management system;

c) A strong relationship with the applicable unions which ensures union representation;

d) The ability of non-managerial workers to participate in the following:

- 1) determining the needs and expectations of interested parties (see 4.2);
- 2) establishing the OH&S policy (see 5.2);
- 3) assigning organizational roles, responsibilities and authorities, as applicable (see 5.3);
- 4) determining how to fulfil legal requirements and other requirements (see 6.1.3);

- 5) establishing OH&S objectives and planning to achieve them (see 6.2);
 - 6) determining applicable controls for outsourcing, procurement and contractors (see 8.1.4);
 - 7) determining what needs to be monitored, measured and evaluated (see 9.1);
 - 8) planning, establishing, implementing and maintaining an audit programme(s) (see 9.2.2); and
 - 9) ensuring continual improvement (see 10.3);
- e) emphasize the participation of non-managerial workers in the following:
- 1) determining the mechanisms for their consultation and participation;
 - 2) identifying hazards and assessing risks and opportunities (see 6.1.1 and 6.1.2);
 - 3) determining actions to eliminate hazards and reduce OH&S risks (see 6.1.4);
 - 4) determining competence requirements, training needs, training and evaluating training (see 7.2);
 - 5) determining what needs to be communicated and how this will be done (see 7.4); and
 - 6) determining control measures and their effective implementation and use (see 8.1, 8.1.3 and 8.2).

6.0 Planning

Effective planning ensures the effectivity of the HSMS such that any requirements by or effects to interested parties are mitigated.

6.1 Actions to address risks and opportunities

The HSMS planning process has considered internal and external issues, along with the needs and expectations of interested parties to: ensure the management system can achieve its intended outcome(s); prevent or reduce undesired effects; and achieve continual improvement.

To maintain the integrity of the HSMS, address risks and opportunities and to evaluate its effectiveness, the planning process includes:

- Management Committee reviews
- System and process audits
- Key performance indicators (KPIs)

These planning processes drive HSMS process actions and are used to evaluate their effectiveness.

6.1.1 General

To determine the risks and opportunities for its HSMS, Western Stevedoring will take into account and document: hazards, OH&S risks and other risks, OH&S opportunities and other opportunities, legal requirements and other requirements.

The planning process will determine, assess, and document risks and opportunities relevant to the OH&S objectives, accounting for the effects of any changes. Any planned changes will be assessed prior to their implementation, and necessary actions will be taken to mitigate the risk and take advantage of any opportunity.

6.1.2 Hazard identification and assessment of risks and opportunities

Hazard identification and assessment of risks and opportunities is embedded within Western Stevedoring's HPP.

6.1.2.1 Hazard identification

Western Stevedoring follows the HPP process as outlined by the COHS and MOHS. This process includes ongoing proactive hazard identification and evaluates how the work is organized, social factors, leadership and organizational culture; routine and non-routine activities including infrastructure, equipment, materials, substances and the physical conditions of the workplace; service delivery, maintenance and disposal, human factors; and how the work is performed (ergonomic risk).

As part of the HPP process, prior and potential incident causes are evaluated to ensure adequate management of risk and hazards.

Potential emergency situations have been evaluated and are part of Western Stevedoring's ERP. Risk to people from hazards has been evaluated including all persons at our workplaces, persons in the vicinity who may be affected and workers at sites which we do not control (i.e. stevedoring operations).

Also considered are ergonomic hazards, nearby hazard affected or not affected by the workplace, which may cause injury or ill health to persons in the workplace.

All changes to the organization, operations, processes and activities (including those to the HSMS) are evaluated either through the management review process or HPP.

Changes in knowledge of, and information about, hazards are analyzed as part of the HPP.

6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system

The HPP's hazard identification and mitigation process identifies and assesses OH&S risks while taking into account the effectiveness of existing controls. This is accomplished through a robust Risk Assessment process.

Other risks related to the establishment, implementation, operation and maintenance of the HSMS are evaluated during the management review process.

Methodologies and criteria used for the assessment of OH&S risks are contained within the HPP. The HPP by its nature is a proactive look at risks and hazards in the workplace.

6.1.2.3 Assessment of OH&S opportunities and other opportunities for the OH&S management system

The HPP and the management review process assess and incorporate opportunities to enhance OH&S performance, while taking into account planned changes to the organization, its policies, its processes or its activities including opportunities to adapt work, work organization and work environment to workers (ergonomics); and opportunities to eliminate hazards and reduce OH&S risks.

Other opportunities for improving the HSMS are evaluated through the management review process including other risks and opportunities that may result from such.

6.1.3 Determination of legal requirements and other requirements

Western Stevedoring consults with the BCMEA, third party consultants and industry working groups to determine and have access to up-to-date legal requirements and other requirements that are applicable to its hazards, OH&S risks, and OH&S management system. Included in this consultation is the determination of how these legal requirements and other requirements apply to the organization and what needs to be communicated.

Legal and other requirements are taken into account when establishing, implementing, maintaining and continually improving our HSMS. These include the additional risks and opportunities that these changes may cause.

Review of updated legal and other requirements is conducted and documented during the management review process.

6.1.4 Planning action

The planning of actions conducted during the management review will be based on the hierarchy of controls; best practices; technological options; and financial, operational and business requirements.

The actions below will be integrated as part of the HSMS process. Actions to address risks and opportunities will be determined by management, major incident and statistical reviews. Actions to address legal requirements and other requirements will be determined by management and third party compliance audit findings. Actions to prepare for and respond to emergency situations are directed by the company's Emergency Response Plan.

6.2 OH&S objectives and planning to achieve them

Objectives and planning are critical to the success of any HSMS.

6.2.1 OH&S objectives

Western Stevedoring will establish business unit level OH&S objectives on an annual basis in order to maintain and continually improve the HSMS and OH&S performance.

OH&S objectives will be communicated, monitored and updated as required. In consultation with workers, OH&S objectives will be measurable and take into account applicable requirements and assessed risks and opportunities.

6.2.2 Planning to achieve OH&S objectives

To achieve our OH&S objectives, Western Stevedoring will integrate and document as part of our annual business planning process, determining what each business unit will accomplish within the planning horizon. Each business unit leader will be responsible to assign adequate resources to achieve the objectives within the requisite timeframe.

7.0 Support

7.1 Resources

Western Stevedoring will continuously review and ensure adequacy and provision of the resource pool required for the establishment, implementation, maintenance and continual improvement of the HSMS.

7.2 Competence

Worker competence directly affects OH&S performance. Therefore, Western Stevedoring will determine the necessary level of worker competence, including hazard identification, and ensure the appropriate documented training program is provided. The BCMEA will review, evaluate, and document the effectiveness of training programs provided on behalf of Western Stevedoring on an ongoing basis. Western Stevedoring provided training programs will be reviewed and evaluated after any applicable incident.

7.3 Awareness

The OH&S policy is available publicly via the Internet, and OH&S objectives are available through each business unit manager. Implications and potential consequences of not conforming to the HSMS are communicated through safety advisories and bulletins and publicly through the Internet.

Improved OH&S performance is the direct result of worker contributions and compliance with the HSMS. These improvements are communicated to workers through their representatives on the JHSC.

The effectiveness of the HSMS is dependent upon worker awareness. Workers have the right to refuse dangerous work, as such they shall be made aware of relevant hazards and risks along with mitigation measures. Awareness of the outcomes of relevant incident investigations will be promulgated through the relevant JHSC.

7.4 Communication

Communication is key to the effective implementation of any business system.

7.4.1 General

Determining what, when, with whom to communicate and the process for communicating shall be directed by the HSMS as established by Top Management.

Key items to communicate include: scope, list of interested parties, policies, updates and changes (including legal requirements), identified hazards including risk assessment outcomes, opportunities, actions and objectives.

Factors to consider when communicating shall include: diversity aspects, whether parties are internal or external (see below for details) and legal and other

requirements. In addition, ensuring information relevance, consistency and reliability is essential.

All communications shall be retained electronically.

7.4.2 Internal communication

Internal communication of the above shall occur during/following the management review process through the sharing of minutes. The management review process shall take into consideration changes to the HSMS including worker contributions and recommendations as received through the JHSCs.

7.4.3 External communication

External communication shall be as directed by Top Management including external communication to JHSCs, contractors, visitors and other interested parties, taking into account legal and other requirements.

7.5 Documented information

Documenting information is critical to the HSMS as items not documented are typically considered not to have occurred.

7.5.1 General

To ensure its effectivity, this HSMS requires specific documented information that is retained electronically. Any requisite information not received electronically shall be converted and saved into an electronic file.

7.5.2 Creating and updating

Document control is key to the storage and retrieval of electronically saved files. Western Stevedoring utilizes user-based document identification when creating or updating documents based on user need.

Western Stevedoring utilizes global standard document formats (i.e. MS Word, MS Excel, PDF etc.).

File storage protocol and naming conventions are reviewed by the HSQE Department annually on the first business day following January 1.

7.5.3 Control of documented information

Documented information is controlled including availability, suitability, storage, preservation, version control and retention via electronic access permissions to HSQE files.

As per 7.5.1, any requisite information not received electronically shall be converted and saved into an electronic file including documents of an external origin.

8.0 Operation

Western Stevedoring considers the following to be our operations: Western Stevedoring, Associated Stevedoring, Squamish Terminals, Coast 2000, BCVPC, and Tidal Transport.

8.1 Operational planning and control

8.1.1 General

Each of the individual operations listed above has established operational processes/procedures and controls which take into account the appropriate criteria required to execute those processes/procedures.

Detailed documentation regarding the establishment of our processes/procedures is found within the HPP, including the adaptation of work to workers as required.

As Western Stevedoring is a multi-employer workplace, operational planning and control processes are shared between each of the operations.

8.1.2 Eliminating hazards and reducing OH&S risks

The HPP focuses on the elimination of hazards and reducing OH&S risks following the hierarchy of controls (elimination, substitution, engineering, administrative and PPE).

8.1.3 Management of change

Change is constant in an operating environment and as such the HPP accounts for incremental review of processes/procedures.

Changes to workplace locations and surroundings; work organization; working conditions; equipment; workforce; legal and other requirements; hazards and risks and technological development are reviewed as part of the HPP.

8.1.4 Procurement

Western Stevedoring reviews the HSMSs of our key vendors/contractors in order to ensure their conformity to our HSMS. This review includes any activities or operations that impact Western Stevedoring, our contractors or interested parties.

Presently Western Stevedoring does not typically outsource our operations, processes/procedures, exclusive of Prince Rupert log stevedoring which is not presently subject to this HSMS.

8.2 Emergency preparedness and response

Western Stevedoring maintains a documented ERP which establishes a planned response to emergency situations including the provision of first aid. Training is provided during the

periodical testing and exercising of the ERP including the evaluation of Plan performance. Plan revisions are made in response to lessons learned during tests/exercises.

The ERP is communicated to all workers and interested parties through public postings on the Internet, and internally through crew-talks.

The ERP utilizes an ICS model including unified command allowing for requisite communication and incident command/control hand off to emergency response services.

9.0 Performance evaluation

Evaluation of performance is key to any management system.

9.1 Monitoring, measurement, analysis and performance evaluation

9.1.1 General

Western Stevedoring has established processes for the monitoring, measurement, analysis and performance evaluation of the HSMS and its processes and procedures.

The following key components will be monitored and measured through the management review process: the extent to which legal and other requirements are fulfilled; the HPP; opportunities; OH&S objectives and the effectiveness of operational and other controls.

An annual audit process will be utilized to establish the criteria against which the organization will evaluate its OH&S performance including the methods for monitoring, measurement, analysis, and performance evaluation. Audit results will be analyzed, evaluated and communicated through the management review process to determine the effectiveness of the OH&S management system.

9.1.2 Evaluation of compliance

Compliance with legal and other requirements shall be conducted as per Section 6.1.3 of the HSMS during the management review process.

9.2 Internal audit

9.2.1 General

Western Stevedoring will conduct annual internal audits to ensure the HSMS conforms to internal requirements, policy and objectives including those outlined within the HSMS. Internal audits will also ensure the HSMS is effectively implemented and maintained.

9.2.2 Internal audit programme

Taking into consideration previous audit results, Western Stevedoring will plan, establish, implement and maintain an audit program.

Documented annual internal audits will be evidentiary sample-based conducted by internally trained auditors. Audits will be planned and internal auditors assigned on a voluntary basis the beginning of each year during the first management review. Internal auditors will work in teams to ensure objectivity and impartiality of the audit process. A standardized audit form will be utilized for both audit guidance and reporting.

Audits will be conducted of the following areas: HSMS, Management Review Process, HPP (including a representative sample of operational processes and procedures), stakeholder and other requirements. Individual audit criteria will be determined by each individual internal auditor's audit plan.

Internal audit reports will be shared with relevant managers, interested parties and the JHSCs along with action plans and documentation to address nonconformities and provide for continual improvement of OH&S performance. Audit documentation will be retained and stored electronically.

9.3 Management review

As outlined throughout this HSMS, top management will conduct reviews of this system at planned intervals to ensure its continuing suitability, adequacy and effectiveness.

The management review process will include documented consideration of discussions and decisions related to:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the HSMS including:
 - 1) the needs and expectations of interested parties;
 - 2) legal requirements and other requirements;
 - 3) risks and opportunities;
- c) the extent to which the OH&S policy and the OH&S objectives have been met;
- d) information on the OH&S performance, including trends in:
 - 1) incidents, nonconformities, corrective actions and continual improvement;
 - 2) monitoring and measurement results;

- 3) results of evaluation of compliance with legal requirements and other requirements;
 - 4) audit results;
 - 5) consultation and participation of workers;
 - 6) risks and opportunities;
- e) adequacy of resources for maintaining an effective HSMS;
- f) relevant communication(s) with interested parties;
- g) opportunities for continual improvement.

Outputs from management review will include the above in addition to decisions related to: the continuing suitability, adequacy and effectiveness of the OH&S management system in achieving its intended outcomes; continual improvement opportunities; any need for changes to the OH&S management system; resources needed; actions, if needed; opportunities to improve integration of the OH&S management system with other business processes and any implications for the strategic direction of the organization.

Management review outputs will be shared with relevant managers, interested parties and the JHSCs along with action plans and documentation to address nonconformities and provide for continual improvement of OH&S performance. Management review documentation will be retained and stored electronically.

10.0 Improvement

10.1 General

Through the management review, internal audit, HPP and other processes the organization shall determine opportunities for improvement and implement them as necessary to achieve the intended outcomes of the HSMS.

10.2 Incident, nonconformity and corrective action

Nonconformities to this HSMS will be documented and processed as an incident. Western Stevedoring has an established incident reporting process which includes: investigation, determination of root cause, and implementation of corrective actions. All incidents will be reported in a timely manner including related actions to correct, control and manage the outcomes.

All incidents are evaluated with the participation of the JHSC and other relevant interested parties, including corrective actions to eliminate root cause/nonconformity. A review of prior similar incidents will be conducted to evaluate overall effectivity of corrective actions.

The HPP includes the assessment of risks including any requisite action needed based upon the hierarchy of controls. Any operational changes will be reviewed through the HPP process, including OH&S risks that relate to new or changed hazards. The HPP includes periodic review of HSMS effectiveness and the JHSC would make recommendations based on any HPP findings.

The JHSC reviews documented incidents and nonconformities along with the effectiveness of the associated corrective actions. In addition, other relevant interested parties (i.e., regulatory agencies, shareholders, etc.).

10.3 Continual improvement

Western Stevedoring will continually improve the suitability and effectiveness of the HSMS by setting objectives within a culture that supports the enhancing of the HSMS performance.

Worker participation in continual improvement activities of the HSMS is ensured through both the HPP and JHSC, including regular documented communication of continual improvement results.