



# A&A Trading Ltd.

2023
BASE 4
Report
April 3-6, 2023

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# **Executive Summary**

The conclusion of the audit is that A&A Trading Ltd. has yet again met the scoring requirement for a successful outcome.

The audit was a maintenance audit.

The overall score achieved was 100% in elements PDCA exceeding the requirement of  $\geq$  50% on each question and > 80% overall.

A&A Trading Ltd. continues as a high performing organization with minor safety program improvements since the 2022 audit including:

- extremely minor revisions to the OH&S program,
- continued and consistent implementation of the H&S Program Manual in a pragmatic manner,
- a continued strong orientation and mentoring process consistently implemented.

No recommendations are provided considering A&A's continued excellent safety record and performance with some minor opportunities identified including:

- revising ERP's to remove hazard documentation and making geographic specific ERP's available on the sharepoint site,
- reviewing and adopting Serious Incident Fatality potential theory into the incident investigation process,
- ensuring actions to address staff concerns are always communicated back to staff.

The company is named A&A Trading Ltd.

A&A Trading Ltd.'s WorkSafeBC account number is 556622.

A&A Trading Ltd. operates within WorkSafeBC Classification Unit #703008.

The audit occurred April 3<sup>th</sup> through 6<sup>th</sup>, 2023 in Vancouver and Campbell River, BC. Four days were spent conducting the audit.

Data collection was completed on the last day indicated above.

The site review included Vancouver and Campbell River offices. Observations and interviews occurred at the sites and allowed a review of employees active in the office and preparing for/leaving for the field as well as returning from the field. Additional safety based observations were made March 20<sup>th</sup> through 24<sup>th</sup>, 2023 during the environmental/sustainability internal audit. A document review was also completed during the audit. Interviews were described to each interviewee as confidential.

Recommendations are provided in the audit report for A&A's consideration and are intended to aid in improving the OH&S Program Manual to best serve their staff.



Scoring Summary – OH&S Program									
	Awarded	Available	N/A	Available – N/A	% awarded				
P. Planning for Reliable, Injury-free Work	130	130	0	130	100				
D. Doing the Work Well	150	150	0	150	100				
C. Checking for Safe Work	60	60	0	60	100				
A. Adjusting for Better Work	60	60	0	60	100				
Total	400	400	0	400	100				



# **Consolidated Corrective Action Log**

Findings include seven opportunities for improvement.

Points scored	Audit Question	Recommendation / Continual Improvement Item	Company Action Plan	Assigned To	Due Date	Date Closed	Verified By
10/10	P1.1	Consider integrating the safety goals/objectives matrix into the Safety Improvement Plan as described.					
10/10	P3.2	Consider adjusting the ERP documents to remove the hazards field and make the geographically specific ERP templates available through the sharepoint site.					
10/10	D1.2	Consider shortening the OHSP/JSB documents as recommended.					
10/10	D4.1	Locate the missing orientation form or recreate it making a notation that it was lost/misfiled.					
10/10	D6.1	Consider including SIFP theory into the incident investigation process.					
10/10	C1.1	Consider a change to contractor safety inspection frequency based on results as recommended.					
10/10	C2.1	Ensure corrective actions are communicated back to staff as recommended.					



### **Audit Details**

P. PLANNING FOR RELIABLE, INJURY-FREE WORK								
P1. Goals and Objectives								
P1.1	How does company leadership set and measure	0	D		Total			
#1	goals and objectives for improved safety		3	7	10			
	performance and communicate them to all	0	0-3	0-7	/10			
	employees and contractors?							

Intent: Setting clear goals and objectives is a key method for management to demonstrate leadership. Having goals and objectives shows due diligence that leadership has reviewed the current company situation and set goals or directions for improvement. Goals are reviewed annually and have measurable targets and objectives. Communicating goals to the rest of the company is critical to success, so the communication portion of this question is weighted heavier than the existence of the goals.

**D** – If the senior management has written safety performance improvement goals and objectives and that these are related to previous results, award 1 point. The format and method of recording those goals should be appropriate for the risk and complexity of the organization. Goals should be reasonably achievable, set by management and meet regulatory and legal requirements, including changes to those requirements. **D** – If the company can show that goals and objectives are communicated to workers and contractors, award 1 point. Potential methods include, but are not limited to:

- Meeting minutes at any degree of formality
- Mailouts
- Emails
- Posters or signs

**D** – If at least 50% of the goals are measurable, award 1 point

I - Award up to 7 points based on the % worker and contractor interviews reporting that they understand the major themes of the company goals and objectives.

#### Audit Note:

A&A continues to formalize their safety goals in a Safety Improvement Plan [SIP] (2023 Safety Improvement Plan.pdf) that has three objectives each with indicators/KPI's, responsibilities and timelines for achievement. A&A's overarching goal is articulated in the forward to the Occupational Health & Safety program (OHSP) document as "A&A will have outstanding safety performance with zero serious incidents and no fatalities". All objectives and indicators are beyond legal requirements and are focused on A&A's safety program and improvement of implementation. The SIP is communicated to staff through the regular monthly safety meeting and was introduced at the beginning of 2023. The indicators for each objective are measurable with each indicator being a surrogate for objective measurement. As the overarching goal and SIP document meets all three conditions (i.e. 3/3=100%) three points were awarded.

Interviews with 14 workers (14/14=100%) provided consistent, positive responses with respect to the SIP and that the goals are identified in a matrix and reviewed at the monthly safety meeting. As a result of 100% positive responses received seven points were awarded.

#### Recommendations and Resources

**OFI #1-** A&A may wish to consider integrating the SIP and the 2023 Safety Goals, Objectives, Measures, Targets and Results matrix that supports the SIP having only one document for annual safety goals with the associated actions, targets and responsibilities thereby simplifying the OHSP.



P2. Policy and Procedures							
P2.1	Does the company have a written health and safety policy that	0	D	ı	Total		
#2	identifies health and safety responsibilities?		10		10		
		0	0-10	0	/10		

Intent: A clear written health and safety policy shows commitment by leadership and sets responsibilities for each layer in the company. While the actual policy may take many forms, better policies are signed or otherwise sanctioned by current senior management and dated within the last 3 years.

**D** – Award up to 10 points based on the appropriateness of the policy for the company operations, considering the complexity and risk of company operations

A safety policy could contain:

- A statement of intent, safety objective or aims;
- General responsibilities of management
- General responsibilities of supervisors (where supervisors exist)
- General responsibilities of workers
- A commitment to review the safety program and adjust as necessary
- A balanced commitment to safety and production

The responsibilities may partially overlap, but cannot be wholly duplicated to award points unless all the company managers are supervisors and there are no supervisors that are not also managers.

#### Audit Note: (Documentation only for Endorsement)

The health and safety policy is signed by the president and identifies general responsibilities for all levels of staff and contractors. The policy was reviewed in 2022 following the recommendation in the 2021 audit. The policy is signed by the President, is dated February 23, 2022. The policy is posted in the office foyer, in the OH&SP and on the website (<a href="http://www.aatrading.com/operations.html#operations\_safety">http://www.aatrading.com/operations.html#operations\_safety</a>). The policy contains four statements that articulate the balance of production and worker safety with a commitment to continual improvement of safety performance. More specific responsibilities are identified in sec. C of the Occupational Health & Safety Program manual (OH&S program) dated March 24, 2023.

As a result of having a safety policy posted that meets the seven content conditions of the question and is current (i.e. within the last three years) eight of eight requirements are met equating to 100% and therefore ten points were awarded.



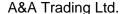
P2.2	What processes are used to determine what the hazards	0	D	I	Total
#3	and risks are at the work site before the job starts and as	6	2	2	10
	they become identified during operations?	0-6	0-2	0-2	/10

Intent: The company needs to have a method to identify existing and reasonably foreseeable hazards before work starts and as issues arise. Pre-work plans and Job Hazard Analysis are 2 common ways, out of many possible ways, to assess risk before a job starts. The objective is to focus on the higher risk issues first and is not intended to be onerous by requiring all low risk activities to have a formal hazard assessment.

- **O** Award up to 6 points based on the % of appropriate identification and management of hazards and risks on the work sites observed (i.e. for hazard observed on site, has the company appropriately managed them). For companies involved in creating plans for other companies, this includes identification and management of those hazards and risks to others.
- **D** Award up to 2 points based on the % completion of records showing that hazards and risks are appropriately identified and prioritized at an appropriate frequency using a cascade of responsibilities from licensee to end-contractor to a degree appropriate to the risk of the hazard. Potential records include, but are not limited to, pre-work plans, supervisor diaries, notes, meeting minutes, manual falling activities with falling plans, maps, evacuation routes and check-in procedures, training records, CVSE logs, road grade assessments and maps, Notices of Project, Wildfire Management Branch notifications or notifications to agencies having jurisdiction that require notifications, inspections and assessment reports. Records need to show who performed the risk assessment, how workers are involved and how the personnel who performed the risk assessment were trained.
- I Award up to 2 points based on % interviewed workers and supervisors reporting appropriate identification and communication of known and foreseeable hazards at the work site.

#### Audit Note: (Documentation only for Endorsement)

Observations of the Vancouver and Campbell River offices were positive with staff following the basic office procedures (i.e. sign in/out, not rushing in hallways, etc.). Hand cleaning stations are present inside each office for cleaning upon entry with a plexi-glass barrier remaining at the reception in the Vancouver office. Each office has integrated fire alarms/smoke detectors and emergency exit lighting maintained by the building managers and are current (invoices/tags) from recent inspections. First aid and earthquake kits are complete with current Epipens available in the Vancouver office and AED's (Vancouver & Campbell River office) showing a charge. C19 procedures have been replaced by a communicable disease procedure (Communicable Disease Prevention Measures April 9/22). Offices are organized and clean. Vehicles are new/er and in good shape with no negative observations of the vehicles. No observations of out of date fire extinguishers in offices or vehicles. Observations of cutblocks in Haida Gwaii and Skaiakos Point (Sunshine Coast) during the 2023 EMS/SFM/CoC audit March 20 - March 24, 2023 were positive with respect to transportation to/from field worksites (commercial flight/vehicle/water taxi) and reviewing planned cutblocks/roads, built/under construction roads and harvested cutblocks in terms of danger tree control, road signage, field worksite sign in/review and staff and contractors wearing all required PPE. As a result of no negative observations, or 100% positive observations at the two offices, two company vehicles and none field worksites) six points were awarded. A&A inspects offices formally on an annual basis to identify hazards/estimate risk and correct any deficiencies with informal inspections/corrections occurring during the year as required. The network files include office safety inspections for 2023 for the Vancouver, Campbell River and Sandspit offices. Employees are responsible for inspecting/maintaining their vehicles on an ongoing/per-use basis with service providers completing mechanical inspections, preventative maintenance and repair. Camp vehicles/pool vehicles are inspected formally at least annually and at each use by the user with a responsible person for each camp/pool vehicle who completes inspections and arranges for repair/maintenance. Employees are also responsible for inspecting their PPE inclusive of the inflatable personal flotation devices (pfd's) which is documented biannually on their Field Worker Assessment forms.





A&A does not submit Notice of Projects to WorksafeBC (WSBC) given it is a contractor/prime contractor responsibility. National Safety Code (NSC) records are not applicable to A&A. A&A Trading Ltd. did not have any WSBC inspections during the audit period. Check-in forms/maps are posted on the wall on clips boards in the Campbell River office with digital copies emailed to the reception/responsible person and after hours check-in person. All forms/records indicate the person/s completing the records. As a result of consistent (i.e. 100% positive) records demonstrating hazard identification and control two points were awarded.

Interviews completed with 14 workers and two supervisors were 100% positive with respect to ongoing hazard identification and control, both formally/documented and informally. As a result of 16/16=100% positive responses received two points were awarded.



P3. Pla	anning to Manage Risks and Upset Conditions				
P3.1	Are there specific written safe work procedures for each	0	D	ı	Total
#4	routine, non-routine and high risk task?		10	0	10
		0	0-10	0	/10

Intent: The company needs written safe work procedures for the work that it does, focussing on the higher risk activities (as described in the company profile). Examples might include skidding as a routine activity and management of site-specific steep slopes as a non-routine high risk task. The safe work procedures need to address the key safety considerations of the company's work.

**D** - Award up to 5 points based on % of safe work procedures written compared to those required based on the company work activities and OHS Regulations. The auditor needs to examine the list or table of contents of the Safe Work Procedures (SWPs) and compare to the company profile activities, observed field activities and auditor experience to determine if the list is appropriate.

Award up to 5 further points based on the average completeness of the safe work procedures that have been written. The focus should be on the higher risk tasks performed by the company and the outcomes of the risk assessment process used in P2.2

Safe work procedures should cover the basics of routine, non-routine and likely upset conditions (i.e. steep slopes), but not necessarily to the level of a full operating manual from a manufacturer. Training materials, point form and graphics are fully acceptable substitutes for full sentences when appropriate and are not intended to be a measure of completeness for the purposes of this question.

Safe Work Procedures need to address as appropriate to company activities and injuries, particularly the high risk activities as listed in the company profile of this audit document and document the provision of standardized engineering controls (i.e. guarding, interlocks, etc.). Safe Work Procedures must include and follow the hierarchy of control (engineering, administrative and then PPE in order). It is recognized that since auditor experience is used as one of the scoring inputs, scores may vary from auditor to auditor

Transportation equipment used to transport 1 or more people includes, but is not limited to:

- On road and off-road vehicles
- Boats
- Aircraft
- Bicycles

Transportation Safety equipment includes, but is not limited to:

- Seatbelts
- First aid kits & PFD's
- Radios
- Helmets



Audit Note from question on previous page: (Documentation only for Endorsement)

A&A maintains a Job Safety Breakdown (JSB) that remains the same as the version for the September 2022 audit dated June 1, 2022 that addresses all of the hazards and situations A&A staff may face. The OHSP had minor revision following the September 2022 audit and is dated March 24, 2023 with sec.E.8/Hazard Identification and Risk Control articulating a hazard and risk model that stipulates the use of controls in a hierarchical manner starting with elimination followed by substitution, engineering controls, signage/warnings, administrative controls and the use of personal protective equipment. The JSB document is comprehensive and includes sections covering:

- general safety rules,
- training,
- PPE,
- communication/sign-out (sign-out/radio use/satellite phones/general emergency response procedures),
- transportation (vehicles/aircraft/helicopters/crew boats/ATV's),
- working in the woods (comprehensive covering 11 areas inclusive of wildlife interactions),
- jump starting vehicles,
- right to refuse unsafe work.

As a result of a comprehensive JSB, a hazard identification model/with hierarchical use of controls to manage risk and a communicable disease procedure five points were awarded.

The JSB manual focuses on the higher risk activities A&A staff face and does not dwell on low risk office hazards which are addressed through the formal and informal inspection program. The JSB manual is reviewed and signed off annually by field staff as evidenced by the 2023 sign off sheets and mention in monthly safety meeting minutes. As the JSB manual is comprehensive covering all areas of work by field staff and includes identification of controls to be used for each task five points were awarded.



P3.2	How does the company ensure that health and safety plans and	0	D	ı	Total
#5	controls are in place so that workers or contractors performing activities at the same time, or otherwise interacting, are	6	0	4	10
	protected?	0-6	0	0,4	/10

Intent: The company needs to have an overall plan that everyone who is or could be interacting understands where each other is and what they are each doing, to avoid running into each other. Avoiding mixing layout crews and active blasting would be an example. Managing vehicle and pedestrian traffic would be another.

**O** - Award up to 6 points based on % of positive observations of work settings and processes having hazards identified and controlled so that workers are not placed in positions of unacceptable risk.

Good work settings and processes should not place workers in hazardous situations without controls in place. Where practical, work activities should be separated by time or distance, specifically addressing stacking of workers on a slope where applicable. Physical controls such as lockout or keeping specified distances away from mobile equipment should be in place where maintenance and operational activities may be in conflict. The degree of control needs to be proportional to the degree of risk. Hazards should be managed by a hierarchy of controls (elimination, substitution, engineering, administrative and finally PPE) in a systematic manner I - If at least 70% of interviewed workers report that the planning is effective, award 4 points. Interviews must include sub-contractors if reasonably available.

#### Audit Note: (Documentation only for **Endorsement**)

Observations of staff working in the offices without rushing and leaving for/returning from the field, signing in/out as well as preparing for field work. In all cases hazards were controlled through house keeping, controlled entrances and mitigative controls (first aid kits/fire extinguishers/communications equipment [InReach/hand held radios/satellite & mobile phones]). Observations during the 2023 EMS/SFM/CoC audit showed preparation/delivery of tailgate meetings in Haida Gwaii and at the wharf in Sechelt prior to arriving at the field worksites and contractor delivery of a tailgate meetings at the log dump/wharf (Skaiakos Point) addressing all hazards known to be present before starting the field tours. No negative observations (i.e. 100% positive observations) of staff at offices and field worksites and travelling between worksites and as a result, six points were awarded.

Eleven field workers of the 14 worker (three office based) interviewed all responded positively to planning operations in a safe and stepwise manner. The office based workers interviewed were excluded from the question as the office work does not require planning for safety in the manner that field work/logging does. Field layout/engineering is thoughtfully planned with people sent to specific areas after submitting a field check in form/map with check-ins throughout the day (with each other or the applicable office if so arranged). Projects are based on a tailgate plan prepared prior to the project with an ERP reviewed at the tailgate safety meeting carried by field staff whether paper based or digital. Harvest operations are planned by the contractors however A&A staff oversee and identifies/addresses any unsafe issues they detect during inspections which follow a documented pre-work that identifies the known hazards and complexities of each operation. Contractor staff were not available during the BASE audit but interviewed during the spring EMS/SFM/CoC internal audit (two contractor principals). As a result of 11 of 11=100% positive responses for planning field worksites in a thoughtful and organized manner four points were awarded.

#### Recommendations and Resources:

**OFI #2** – A&A may wish to consider removing the hazard section from the ERP template as it is repeated in the tailgate meeting template. Further the ERP's for each location (Redonda Bay, Glacial Creek, Misery Creek, etc.) could be posted to the sharepoint with a ERP tab and be easily accessible to any staff member rather than re-creating ERP's for each project. The site specific information would be on the tailgate meeting form and locations on the maps and further documented in the sign out. Such a change will further the objective of streamlining and using technology making OHSP implementation an easier task for staff.



P4. Planning to Protect Personnel							
P4.1	What written requirements does the company have for Personal	0	D	ı	Total		
#6	Protective Equipment (PPE) requirements?	7	2	1	10		
		0-7	0-2	0,1	/10		

Intent: The company needs to clearly communicate the PPE expectations to everyone on site. The expectations could be blanket statements such as wearing a hard hat unless inside a machine or risk-based, such as wearing a hard hat whenever there is a risk of overhead hazards.

- **O** Award up to 7 points based on % observation of workers wearing PPE appropriate for the tasks, based on regulatory and company requirements.
- **D** Award up to 2 points based on the % completeness of the PPE requirements appropriate to the company. The PPE requirements need to include the assignment, selection and maintenance of PPE. The requirements need to meet regulatory requirements and be consistent with company and industry risk assessments and controls (i.e. standard practices). The requirements may specify exactly what equipment must be worn or define risk-based criteria or use a mixture of methods.
- I If at least 70% of interviewed workers are able to describe their PPE requirements, award 1 point.

Audit Note: (Documentation only for Endorsement)

No observations of workers performing tasks that required PPE during the BASE audit. Observations of staff during the March 20-24, 2023 EMS/SFM/CoC audit showed caulk boots, high visibility clothing/rain gear and hardhats with some hard hats having visors to protect eyes when required. Observations of trucks showed PPE available for wet weather, high visibility clothing, caulk boots, hard hats and eye/ear/hand protection available should it be required. As a result of 100% positive observations seven points were awarded.

PPE requirements are specified in the PPE policy/sec. A.3 of the OHSP. The policy identifies the PPE that must be used, when it must be used and the standard requirements (i.e. CSA/ANSI/WSBC) for the PPE article. The policy also identifies what PPE the employer and employee are required to provide. The policy was clarified following the 2022 BASE audit to make it clear that eye protection requirements are less specific but consistent with the JSB that is more specific such that staff must wear eye protection in situations where a hazard is present and face protection when using certain tools. As a result of clear and consistent direction for PPE use and clarity provided for eye/face protection direction with both documents providing 100% clear direction for PPE use two points were awarded.

Interviews with 14 workers (14/14=100%) that included three office based workers that do/may go to the field very infrequently were clear on what PPE was required for field work with the office workers stating A&A has reviewed this with them and will provide PPE should they go to the field/log booms. A constant response was that whatever PPE they require A&A will provide with some staff using face shields on hard hats so that eye protection is available when required and favoured over safety glasses. A&A's provision of PPE is based on the staff member empowered to make decisions and purchase new/replacement PPE and submit an expense report for reimbursement (i.e. don't ask/request but rather act and obtain the required PPE). As a result of 100% positive responses received that exceeds the threshold of 70% for PPE use questions one point was awarded.



P4.2	How has the company clearly communicated how to provide first	0	D	ı	Total
#7	aid services and how to summon first aid services for each work		5	5	10
	site?	0	0-5	0,5	/10

Intent: The company needs to have a plan for first aid. While every injury is preventable, not all are prevented. A good first aid plan minimizes the effect of any injury that does occur.

**D** - If the first aid procedure clearly describes how a worker is to obtain first aid services for themselves or an injured worker, award 3 points. It needs to include roles and responsibilities as well as meeting Regulatory requirements.

If the first aid procedure clearly defines what first aid services are to be provided, award a further 1 point. If the first aid procedure includes a checklist of required supplies and services, that at least meets regulatory requirements, award a further 1 point.

**I** - If at least 70% of interviewed workers and supervisors are aware of the types of first aid resources available and can describe how to access them, award 5 points.

#### Audit Note: (Documentation only for **Endorsement**)

The OH&S program document at sec. H/First Aid Equipment and Services and sec. J/Emergency Response provides a sufficient level of detail to provide clear direction on how to request first aid/emergency response services within the company. The OHSP ERP has been replicated on field cards for reference for field workers and is included with the tailgate for each project. Sec. J.1/Emergency Preparedness provides the specific direction for field projects inclusive of communications. The ERP assigns roles to the crew leader and first aid attendants and as a result, three points were awarded.

Sec. H and J identify the services to be provided which include assessment, onsite stabilization/treatment as determined by the injury and transport via a variety of methods. A&A added TEAAM's to their ERP in 2022 as a means to address rapid evacuation and medical assistance from the field worksites if required. As a result one point was awarded.

Sec. H defines the requirements for first aid resources with the ERP's identifying survival/personal kits as well as level 1 kits with blankets maintained in dry bags for engineering/layout sites and pickups as well as level 1 kits for offices. The direction is provided describing and then identifying the sections of the OH&S regulation that pertains to the specific first aid resource with no deficiencies in first aid kits identified.

Detailed first aid assessments for the offices and field work (parties of one to 15 workers) identifies the resources required in each situation. As a result of consistent identification of first aid resources one point was awarded.

Interviews with 14 workers and two supervisors were unanimous (i.e. 16/16=100%) with respect to identifying the first aid resources A&A provides in both office and field situations. As a result of the 100% positive responses received five points were awarded.



P4.3	What are the written Emergency Response Plans (ERPs)	0	D	ı	Total
#8	for handling other potential emergencies relevant to the		5	5	10
	company's operations and how are they communicated to	0	0-5	0-5	/10
	workers?				

Intent: The company needs to have a plan for each reasonably foreseeable emergency. Everyone on site needs to know what to do in an emergency at a level appropriate for their responsibilities. A master ERP may be many pages long and highly technical, while a laminated card on the truck keychain may be entirely appropriate for the truck driver. The plan is usually a mixture of information from the licensee, prime and contractor, but must be incorporated into the company system and ultimately owned by the company. This question is about the plans other than the First Aid response that is covered in P4.2

**D** - Award up to 4 points based on the % of topics included in the company Emergency Response Plan (ERP) compared to those needed for the operation. Plans should be a mixture of general plans and site-specific documents.

Topics that must be included are:

- General Injuries (<u>MUST</u> specifically include management of blood borne pathogens where level 3 attendants are required or used)
- General Fires (structural, equipment and/or wildfire, as appropriate)
- General Fatalities;
- General and/or Site specific Natural disasters appropriate to the general and site geography (floods, landslides, earthquake, tsunami, sudden severe weather, etc.)
- Site specific Evacuation (coordinates i.e. lats/longs and/or UTM grid /address of site plus as applicable, helipads or ambulance meeting and current routes with maps as applicable)
- Site specific Radio frequencies where radios are used

Other topics that may be included, depending on the complexity and risks of the company, include, but are not limited to:

- General Environmental incidents (spills, leaks, etc.)
- General Missing worker (at least for when a worker who is working alone fails to check in)
- General Violence in the workplace appropriate to needs (road rage, protestors, theft-in-progress, etc.)
- General and /or site specific Rescue from height and confined spaces
- General and/or site specific Water rescue
- General Wildlife encounter

Topics may be combined or standalone and there is no requirement that the titles in the above list be used by the company. The ERP must be obvious in its instruction, have contact information and number/frequency, and assign general responsibilities. It should be easy to understand for all the topics.

If a selected sample of emergency contact phone numbers or radio frequencies are posted and are all correct, award 1 point.

I - Award up to 5 points based on the % of interviewed workers, Supervisors, Managers and Contractors aware of their roles in applicable emergencies. The workers should be able to discuss marshalling points, communication devices, how to contact help, location of emergency numbers and understand any specific assigned responsibilities.



Audit Note for question on previous page: (Documentation only for **Endorsement**)

The OHSP at sec. J/Emergency Response contains the emergency response plans for A&A. The section includes ERP's for:

- Medical emergencies,
- Helicopter medi-vac,
- Ground transport medi-vac,
- Missing person response,
- Fatalities,
- Earthquake,
- Tsunami,
- Lightning storm,
- Landslides,
- Floods.
- Forest fires.

A&A maintains a blood borne pathogen response plan that is reviewed and signed off annually by their designated level I first aid attendants for each office with no current level III first aid attendants. Wildlife is not treated as an emergency response plan but rather addressed as a hazard in the JSB document. Violence in the workplace is not treated as an emergency response plan but rather a policy with specific direction on what to do in the OH&S program document. Working at heights does not apply to A&A. Working on/over water does apply to log traders who tour booms and evaluate them for purchase however there is no emergency response plan as the log traders tour the booms with a water taxi operator and such a plan would be of no value for the log trader; rather a man overboard procedure has been developed with an annual review and rescue drills completed with water taxi operators with a drill planned for 2023 noting the 2023 audit occurred six months after the 2022 audit. Site specific emergency response plans draw on the OH&S program document and plans include coordinates, communication methods and local numbers associated with the particular project. Both the generic/area specific, pre-prepared ERP's and project based ERP's have current phone numbers including emergency services (RCMP/Hospital/etc.) and more importantly, air services for the companies used (TEAAM's, Airspan/Sunshine Coast Air – Sechelt, WCH – Campbell River, etc.), A&A continues to maintain air/boat charter lists with the Air Charter Companies list updated February 3/22 and the last update to the Marine Charter Companies in 2020. As a result of comprehensive ERP's to address all of the emergencies A&A staff could reasonably encounter five points were awarded.

Interviews with 18 of A&A's staff (2 managers, 2 supervisors and 14 workers [18/18=100%]) revealed a consistent, positive response with respect to what is in the company ERP's, what tools they use for communication (radio's w/repeater & w/o repeater, cell phones, satellite phones, In Reach) and what is expected of them in an emergency situation. As a result of 100% consistent responses received five points were awarded.



P4.4	What is the process to manage existing and/or future young	0	D	ı	Total
#9	workers under the age of 25?		5	5	10
		0	0-5	0-5	/10

Intent: Workers under age 25 are much more likely to have injuries and other work-related errors than older workers. Young and old workers communicate in very different ways. The forestry labour shortage means that there are very few older workers available to hire, so all companies need to have at least a plan for managing the young workers that they will need soon.

**D** – Award up to 5 points based on the effectiveness of the company system in managing young workers. This applies whether or not the company has any young workers at the time of the audit. If the company has workers under age 25, the documentation review is based on both procedure and records. If the company does not have any young workers, then the review is based only on procedures. An effective company system should cover

- Orientation
- Competency assessment
- Ongoing communications in an age-appropriate manner
- Frequent assessments through age 25
- Record-keeping
- I Award up to 5 points based on the % positive responses of all management and supervisors (not just those actually having young workers) in their knowledge of the company system

#### Audit Note:

A&A formalized their process for managing young workers in a procedure titled, "Young Worker Assessment Procedure WOP-13". The procedure directs the management of young workers from hiring/orientation through training and mentoring during field work/tasks and indicates when assessments should be documented on the assessment form. A&A had no young workers during the six month audit period (mid September 2022 – April 3, 2023) with two summer students due in May 2023 who will be young workers. A&A documents progress/evaluation of tasks for young workers using the *Young Worker Assessment Form* that is an ongoing diary of tasks completed. Additional assessments are completed on the *Worker Assessment* form. The form are used to implement WOP-13 show ongoing assessment by the supervisor/s demonstrating ongoing supervision and mentoring with completion of varied tasks with details allowing a full understanding of what was reviewed. As a result of a young worker procedure that has been implemented for young workers in past audits but no young workers during the current audit period five points were awarded.

Interviews with the supervisors (2) and nine workers who supervise A&A staff/consultants revealed a good understanding of the procedure and the fact that the procedure formalizes A&A's mentoring for young workers giving them the tools to work safely in the field and office. As a result of 100% consistent responses received five points were awarded.



P5. Pla	anning Documentation				
P5.1	How does the company manage and maintain safety	0	D	I	Total
#10	documentation to ensure safety documents are	3	4	3	10
	communicated and available to workers and contractors?	0-3	0-4	0-3	/10

Intent: The company should share relevant current and historical info appropriate to the worker with the worker, and where applicable the JOHSC or Representative. This shows record keeping credibility, due diligence and accountability. If it is not recorded, it didn't happen. If it is not reasonably retrievable, it's not doing anyone any good.

- **O** Award up to 3 points based on the appropriateness of the documentation system and its users in being able to produce documents needed for the audit in a timely manner to the auditor.
- **D** Award up to 3 points based on the effectiveness of the company system in managing documents appropriate to the needs of the company. Documents need to be retained and where applicable communicated appropriately.

Program reports may include, but are not limited to:

- Internal audits or other safety program evaluations
- External audits and inspections
- Ergonomic assessments
- Perception surveys
- Medical or health monitoring results
- Noise, chemical or other parameter surveys
- Meeting minutes showing communication, specifically including posting and maintenance of JOHSC minutes where a JOHSC is present
- Emails
- Safety alerts

D – If the responsibility for the Workplace Hazardous Materials Information System is assigned in writing in accordance with Regulation, award 1 point.

I – Award up to 3 points based on the % of interviewed supervisors, managers and safety specialists (including JOHSC or Representative where required) in being able to describe how to find necessary safety documents.

#### Audit Note:

A&A has implemented a cloud based sharepoint/intranet site since the 2022 audit allowing staff to access safety documentation/records site remotely as long as they have an internet connection. All records and safety program documents were retrieved from the site with some records maintained on the network drives. Observations of staff retrieving documents from the network safety folder/lower level sub-folders were positive. As a result of a functional document storage/retrieval system three points were awarded.

Documents available on the sharepoint safety tabs include: safety meeting minutes (monthly), JOH&S Rolling Action Tracker, office inspections, ERP drills, engineering/layout tailgate meetings & field ERP cards, contractor safety records (pre-works, safety checklist/PC Assignment forms/safety inspections), incident reports (A&A and contractor), safety program manual/JSB/ancillary procedures, forms, audit reports, training/certification records, SDS, etc. A&A created a record that is appended to the H&S program that states the Forestry & Planning Manager is responsible for WHMIS who is the person who trains workers using A&A's in house WHMIS 2015 training program. Orientation/worker assessments/Next of Kin forms are maintained in secure folders only accessible by the JOH&S committee and human resources staff. The document review identified the SDS are up to date with a recent, documented review. As a result of all documents required to be reviewed being available on the network safety folders with the SDS data sheets out of date three of four points were awarded.

Interviews with 18 staff inclusive of the VP Operations and General Manager, two supervisors and 14 workers which included three of six current JOH&S committee members provided a consistent, 100% positive response with respect to accessibility of records on the sharepoint or network folders. As a result three points were awarded.



P6. Pla	P6. Planning for Investigations							
P6.1	What are the company's written procedures for the reporting	0	D	I	Total			
#11	and investigation of incidents, specifically including close		5	5	10			
	calls / near misses?	0	0-5	0-5	/10			

Intent: Company reporting needs to capture close calls and near misses, not just actual injuries since this is where the 'free learning' is. Investigation needs to be appropriate for the degree of the risk of the event rather than just the severity of injury and maximize the learning from incidents.

- **D** Award up to 5 points based on the % of applicable requirements met. The investigation policies and procedures must include:
  - Responsibilities of reporting by all personnel (employees, visitors, contractors)
  - Immediate reporting of all incidents including injuries, close calls / near misses and property damage
  - Descriptions of what type of event receives what level of investigation or review (if any).
  - Responsibilities and authorities of persons involved in the investigation including the requirement that they be knowledgeable of the type of work being investigated.
  - Procedure for carrying out investigations including the follow up of reports
  - A requirement for worker participation in investigations (other than the affected worker or as witnesses)
    when the company has sufficient personnel on a worksite to make this practicable or if the company
    has a JOHSC or Representative on-site

The company must specifically list injuries, close calls / near misses and property damage to be awarded the applicable points. Specifying 'all incidents' is insufficient unless the phrase 'all incidents' contains a definition that includes the specifics. There is no intent to require a company to perform formal individual investigations of 'paper cut' level injuries.

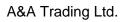
- I Award up to 3 points based on % of worker interviews reporting that they understand and follow their incident reporting requirements.
- I Award up to 2 points based on % of supervisor interviews reporting understanding of appropriate investigation protocol.

#### Audit Note: (Documentation only for **Endorsement**)

The OHSP manual @ sec. K/Investigation of Incidents directs A&A incident investigation. The program directs all staff, contractors and visitors by role/position at sec. C/Safety Roles and Responsibilities to report all injuries or close calls. Contractor incident reporting is addressed in sec. A.4 of the supplement to the OHSP document and directs incident reporting by contractors within 24 hours or close calls within 72 hours. In addition, A&A sent a communication to contractors during the audit period clarifying the reporting timeline to ensure contractors are ware if and submit incident/close call reports. The EMS/SFM/CoC system directs staff to complete incident reports for environmental, sustainability, chain of custody and safety incidents/serious close Environmental, sustainable forest management are directed by the EMS Manual and very specifically, WOP-05/Incident Reporting. The OH&S Program manual at sec. K/Investigation of Incidents identifies the process for incident investigation, the persons responsible for the investigations and their authority to conduct investigations. As A&A staff work as "workers, supervisors and managers" with a project lead on an interchangeable basis (i.e. a manager will work with a team and complete worker tasks in a field environment) the worker participation requirement is satisfied. The routing of incident reports is to the JOH&S committee from the supervisor for review and final acceptance. As a result of a clear process for investigating incidents and clear direction for reporting incidents and close calls inclusive of visitors to report incidents/close calls (i.e. 100% of all parties) five points were awarded.

Interviews with 14 workers provided a consistent response to understanding the incident/close call reporting process and stating should they be involved in a close call/incident they would report it as immediately as practicable. As a result of the 100% (i.e. 14/14=100%) positive responses received three points were awarded.

Interviews with the two supervisors and nine workers who supervise A&A staff/consultants revealed a consistent response to incident investigation and how they work with A&A management/JOH&S committee members to complete incident investigations. As a result of 100% consistent responses received two points were awarded.







P7. Planning for Contractors									
P7.1	If the company hires contractors, what is the method used to	0	D	ı	Total				
#12	determine that contractors are qualified to work safely?		5	5	10				
		0	0-5	0-5	/10				

Intent: The company needs to show due diligence by considering the safety of the contractors, not just accepting low-bid parameters. This could include reference checks, certifications held and personal knowledge.

#### This question is not applicable if the company does not hire contractors.

**D** - If there is a clear documented outline of non-dependent contractor safety requirements, award 4 points. This must include a system being in place to determine if the contractors are qualified to work safely. The rigor of the assessment should be proportional to the level of risk of the activities.

If there are records of the selection requirements being applied consistently to all contractors, award 1 point.

**I -** Award up to 5 points based on % interviewed persons hiring contractors understanding the company program.

Selection criteria may include non-safety items, but only safety-related items are in scope for this audit question.

This question applies to all contractors, working for the company rather than just forestry contractors. Visitors are excluded from the scope of this question. See 'Definitions' section for contractors and visitors

#### Audit Note: (Documentation only for **Endorsement**)

Contract management is maintained in a separate appendix in the OHSP document. Appendix A covers contract management while appendix B covers prime contractor assignment/multiple employer workplaces. Sec. A1 identifies contractor requirements that must be achieved and is assessed by A&A evaluating the contractor's OH&S program using A&A's *Safety Checklist*. Once the checklist is complete with any deficiencies addressed or a suitable action plan completed, A&A allows contractors to commence work and follow up with a safety inspection. The appendix identifies contractor responsibilities and A&A's Contract Manager responsibilities. A review of the network folders showed annual, contractor sub-folders with safety checklists, safety inspections, copies of OH&S programs, NOP's, ERP's and other related contract documentation. Official contract documents are stored elsewhere. The auditor's safety as a consultant was documented by way of an engagement letter specifying how the auditor's safety would be managed on A&A worksites. As a result of a credible system that sets a minimum standard for contractors, has consistent records to support its implementation and has been reviewed by WSBC in significant contractor incidents five points were awarded. Interviews with 11 staff who hire, direct or inspect contractors/consultants revealed a clear understanding of the contract management process inclusive of contractor evaluation and contractor safety inspections with

comments that the process is followed on a consistent basis. As a result of 100% (i.e. 11/11=100%) positive

Recommendations and Resources:

responses received five points were awarded.



P8. PI	anning for Multi-Employer Workplaces				
P8.1	If Multi-Employer Workplaces are created by the	0	D	ı	Total
#13	company, how are these workplaces planned to ensure a		5	5	10
	mechanism is, or will be, in place to ensure they are	0	0-5	0-5	/10
	coordinated and have a system of compliance?				

Intent: The company needs to show due diligence by managing multi-employer workplaces to ensure that they are properly coordinated. This could be done by assigning Prime Contractor status or by being the Prime Contractor or owner without assigning Prime to another party.

#### This question is not applicable if the company does not create multi-employer workplaces.

**D** - If there is a clear documented outline of how the company manages, or intends to manage its Multi-Employer workplaces (MEWP's), award 4 points. This must include a system to ensure coordination of the multiple employers and ensure that the multiple employers are all in compliance to their own requirements and to the overall workplace plan. The rigor of the management should be proportional to the level of risk of the activities.

If there are records of the requirements being applied consistently to all worksites, award 1 point. Not applicable if there have been no MEWP's in the last year

**I -** Award up to 5 points based on % interviewed persons who plan MEWP's understanding the company program.

Program criteria may include non-safety items, but only safety-related items are in scope for this audit question. This question applies to all MEWP's that the company has rather than just forestry MEWPs. Visitors are excluded from the scope of this question. See 'Definitions' section for contractors and visitors.

#### Audit Note: (Documentation only for **Endorsement**)

Appendix B describes the process for managing multiple employer worksites which is done through evaluation of a contractor's ability to be the Prime Contractor and if so, assignment of Prime Contractor responsibilities for the worksite/project. The section directs the assignment of Prime Contractor to be in writing either in one of A&A's contract documents or on a Prime Contractor assignment form signed off by both A&A and the contractor being assigned the responsibilities. In addition, the assignee must name a supervisor for the project, have the procedures necessary to provide oversight of all sub-contractors and identify a method by which they will communicate hazards, complete a first aid assessment, provide necessary first aid resources and provide a communication forum for all contractor staff (i.e. safety meetings). In addition, the assignee must have a suitable incident investigation/reporting program that addresses all sub-contractors at the worksite. As a result of a comprehensive program for assessing, assigning and implementing Prime Contractor responsibilities for multiple employer worksites four points were awarded.

Records in the annual contractor folders showed assignment of Prime Contractor responsibilities, Safety Checklists that evaluated the Prime's OH&S programs and safety inspections that A&A completes to ensure Prime's are fulfilling their responsibilities at the multiple employer worksites. As a result of consistent implementation as evidenced by completed forms one point was awarded.

Interviews with 11 staff who hire, direct and/or inspect contractors/consultants and assign Prime Contractor responsibilities or in the case of engineering/layout consultants that work with A&A staff where A&A retains the role of Prime Contractor revealed a clear understanding of the contract management process inclusive of contractor evaluation and contractor safety inspections and Prime Contractor assignment when appropriate with comments that the process is followed on a consistent basis. As a result of 100% (i.e. 5/5=100%) positive responses received five points were awarded.

P. Planning for Reliable, Injury- Free Work – Scoring Summary										
	Awarded Available N/A Available – N/A %									
Total	130	130	0	130	100					



D. DOIN	D. DOING THE WORK WELL								
D1. Leading by Example									
D1.1	Are managers and supervisors leading by example and	0	D	ı	Total				
#14	following the health and safety rules and procedures?	7	0	3	10				
		0.7	0	0.3	/10				

Intent: The company needs to demonstrate that safety applies from the top down and that everyone is expected to 'walk the talk'. If supervisors do not follow the rules, workers will also cut corners.

- **O** If at least 90% of observations show that managers and supervisors are actively following regulatory, manufacturer and company safety rules and requirements, award 7 points. Examples of positive observations may include, but are not limited to: wearing appropriate PPE, wearing seat belts and driving within road rules and conditions, communicating their presence around mobile equipment and keeping clear of hazard areas.
- **I** If at least 90% of interviewed workers state that managers and supervisors always follow all safety rules, award 3 points.

#### Audit Note:

Positive observations of PPE available in the vehicles reviewed/worn during the 2023 EMS/SFM/CoC audit along with required safety response equipment (FA kit/blankets, current fire extinguishers, jumper cables, etc.) in vehicles noting no observations of managers in the field. All office based observations of managers and supervisors were positive and as a result seven points were awarded.

Interviews with 14 workers (11 field/3 office) provided consistent, positive responses with respect to the managers and supervisors following the safety program, articulating safety issues at safety meetings/ad hic conversations and always following the safety rules when in the field. As a result of the consistent, 100% positive responses received (i.e 14/14=1.0\*100=100%) three points were awarded.



D1.2	Have general safety responsibilities been written and	0	D	I	Total
#15	communicated to employees?		2	8	10
		0	0-2	0-8	/10

#### Intent: Company leadership sets the tone and culture in terms of safety expectations.

**D** – Award up to 2 points based on % of employees with general safety responsibilities (i.e. not job-specific safe work procedures). Examples could include

- wearing seatbelts,
- · driving with all lights on all the time,
- staying between the yellow lines in the mill yard,
- fit to work (with fatigue specifically be included in the note and a loss of 1 point if not)
- not going on sites without an orientation,
- not operating any machine unless trained to do so

**I –** Award up to 8 points based on % of workers, supervisors and managers able to describe their general safety responsibilities.

#### Audit Note:

A&A's staff are all oriented to the OHSP at the start of their tenure with the company and renewed annually. A&A's OH&S program at sec. C/Safety Roles and Responsibilities identifies the roles/responsibilities for each position in the company as described previously. Each position has a section titled "General" which identifies general responsibilities which are safety rules. This is augmented by sec. E/ Instruction of Workers and Supervisors that identifies general safety rules applicable to all positions (orientation, training, Workplace Violence policy/Bullying & Harassment policy, Impairment policy, Injury Management Program, Progressive Discipline policy, etc.). The JSB document at sec. 2 further identifies general safety rules prior to becoming specific at sec. 3. All staff have access to the documents through the sharepoint/network folders at each office inclusive of the Sandspit office. The Impairment policy at sec. E.7 includes fatigue as a form of impairment and was updated to identify marijuana explicitly in late 2018 and renamed the Impairment policy. Sec. C.4/Refusal of Unsafe Work was updated to identify regulation 3.12.1 following the 2022 recommendation however this is not mandatory but rather something that must be completed if work is to be re-assigned. As a result of having general safety rules for all staff, providing them and reviewing them at orientation and making them available through the network with all required regulatory/certification topics addressed (i.e. 100% of topics) two points were awarded.

Interviews with 18 members of A&A's staff revealed a consistent, positive response to knowing and understanding the general safety rules for working in the office, sign out, working in the field, driving and general workplace conduct/expected standards of behaviour. As a result of 18 of 18 positive responses received (i.e. 18/18=100%) eight points were awarded.

#### Recommendations and Resources:

**OFI #3** – A&A may wish to shorten the OHSP/JSB documents by removing sections that are copies of the OHS regulation and replacing them with a shorter, paraphrase and identifying the section of the regulation for staff to review if desired. By way of example the section on the Right to Refuse unsafe work could be significantly shortened and a few succinct statements made with sec. 3.12/13 referenced. The same is true for the three page WSBC first aid assessment worksheet that is not used by A&A. Removal will shorten the manual by three pages and a brief section could identify why, when and how first aid assessments are completed.



D2. Ma	D2. Managing Risks and Upset Conditions							
D2.1	How are the documented hazards and risks and associated	0	D	ı	Total			
#16	safe work procedures communicated to workers and			10	10			
	contractors before the job starts and as issues arise during	0	0	0-10	/10			
	work?							

Intent: The quality of communication reinforces the ability of workers to know and more importantly understand the hazards and what to do about them. This interview question is different from the planning documentation question – this question addresses the communication of the plan at ground level.

I - Award up to 10 points based on % of positive responses from interviewed workers reporting receiving communication on the hazards, risks and controls for their work activities appropriate for the level of risk of those activities and understanding those communications. Communications need to be appropriate to the audience, such as new workers, young workers and those with different language and literacy levels. The reported risk communication may be written and/or verbal.

Potential hazard communication methods may include, but are not limited to:

- Pre-work meeting records
- Signed falling plans for blocks
- Steep slope and steep haul planning records
- Shift change log book
- Site safety meeting records
- Supervisor journals
- Email
- Machine, vehicle or process log books
- Lock-out / Tag-out.
- Posting of inspections or reports from external bodies such as Primes, licensees and WorkSafeBC

#### Audit Note:

11 of 14 workers who are field workers responded to the question stating the primary method of hazard communication is through the pre-work process/project planning process. For logging/silviculture contractors the EMS pre-work form was identified as the means to communicate both safety hazards and environmental aspects. As an alternative, the Work Site Hazard Assessment worksheet is also used. Both forms document known hazards and are used to communicate to staff and/or contractors for each project.

For engineering/layout projects where A&A may work with an in house crew or with consultant staff the Tailgate Safety Meeting form was referenced as the means of hazard communication with a Field Safety Card (site specific ERP) developed for each project. The Tailgate Safety Meeting identifies the project supervisor, the crew, locations of blocks and general area, the radio channel for field communication/other communication method, known hazards/controls, other topics, daily PPE requirements while the Field Safety Card is a project specific ERP with block locations, phone numbers, repeats work hazards, identifies local radio frequencies and includes a emergency response procedure for injured workers. A&A added TEAAM's to their company as a means of emergency assistance/evacuation from remote worksites with the contact number identified on ERP's. Office workers (three) identified formal and informal inspections of their offices as a means to identify and correct hazards. As a result of all 11 field workers and all three office workers responding positively (i.e. 100% positive responses received) ten points were awarded.



	What is the maintenance program for company-	0	D		Total
#17	controlled facilities, tools and equipment that meets	6	2	2	10
	company, manufacturer and regulatory requirements?	0-6	0-2	0-2	/10

Intent: The company needs to have a maintenance program for every important item that it controls that needs maintenance. The program needs to be appropriate to the level of risk involved with each item.

- O Award up to 6 points based on observation of company-controlled facilities, tools and equipment being maintained to necessary standards, based on the level of risk of the object being maintained.
- D Award up to 2 points based on the % of sampled tools and equipment covered by the maintenance program in a manner that meets manufacturer, regulatory and company safety requirements, based on the level of risk. Potential sources of records include, but are not limited to:
  - Equipment inventory lists:
  - Maintenance schedule:
  - Equipment inspection records (whether user or maintenance personnel inspections); and
  - Computer-based maintenance management systems.

Mobile equipment user inspection records need to meet all requirements for the appropriate type of mobile equipment, including the requirement for pre-use inspections and testing of emergency and warning systems.

I - Award up to 2 points based on the % of positive responses from interviewed managers and supervisors confirming the maintenance program meets manufacturer, regulatory and company safety requirements. In all parts of this question, the scope only applies to facilities, tools and equipment that are under direct company control and is responsible for maintaining. If the company contracts out maintenance in whole or in part, then the documentation is limited to user records rather than detailed maintenance records. For any commercial vehicles, the intent is not to duplicate CVI requirements but rather examine how the

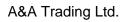
company maintains records and whether items not typically included in CVI, such as first aid kits, fire tools and log bunks are properly maintained.

#### Audit Note: (Documentation only for **Endorsement**)

A&A's equipment that requires inspection/maintenance and repair are vehicles. The company offices are subject to at least annual inspections and show signs that this is taken seriously with any deficiencies addressed. Observation of vehicles showed them to be newer, in good working order with no negative observations. Camp vehicles are older trucks and inspected by the responsible person and by operators at each use noting infrequent use with trucks stored at camps until the camp resumes operations or the truck is moved to a new location. A&A no longer uses/owns an ATV. Positive observations of the offices, vehicles. field worksites (2022 EMS/SFM/CoC audit). No negative safety related observations at two offices, with two vehicles and 11 field worksites therefore, as a result of 100% positive observations, six points were awarded.

A&A's system for tracking preventative maintenance and repair for vehicles is simple and effective given the smaller fleet. Operators are responsible for having their vehicles serviced/repaired and submit receipts to the company for payment/tracking. The company maintains a tracker that shows which vehicle is driven by which employee and tracks the history of preventative maintenance and repair. Camp and pool vehicles are tracked in the same manner on the same worksheet in a separate tab with an A&A employee is assigned responsibility for the vehicle and must arrange preventative maintenance and repair although the vehicles do not get significant mileage at the camps. The camp vehicle used in the 2023 EMS/SFM/CoC internal audit on Haida Gwaii had inspections completed during the audit period. Service providers complete mechanical inspections of the vehicles during service/repair with camp vehicles serviced in town when moved from camp to camp. Operators complete visual inspections of the vehicles on a per-use basis and are responsible to ensure the first aid kit, blankets, tow rope/jumper cables and fire extinguisher are present. As a result of a functional system of inspection, service and repair that show correction of deficiencies two points were awarded.

Interviews with the VP Operations, the General Manager and two supervisors revealed a solid understanding of the inspection/maintenance program and as a result of the 100% positive responses received two points were awarded.







D3. W	orking Safely				
D3.1	Are workers complying with safe work procedures, company safety	0	D	-	Total
#18	rules, manufacturer standards and regulatory requirements?	10			10
		0-10	0	0	/10

Intent: The company needs to set and maintain expected levels of behaviour. While 'safety is what happens when no one is watching', auditor observations indicate how seriously workers are treating the system.

**O** - Award up to 10 points based on % observations of workers following applicable company, regulatory and manufacturer requirements.

Requirements, as appropriate to company activities and their risk levels, include but are not limited to:

- Hiring Contractors
- Lockout
- Manual Tree Falling
- Commercial Vehicles
- Heavy Equipment Operations
- Respiratory Protection
- Having Young Workers (under age 25)
- Camps and Remote Accommodations
- Working near High Voltage Power Lines
- High Hazard Materials
- Assigning Prime Contractor status
- Working at Heights
- Combustible Dust
- Hot Work
- Confined Space
- Working over or on Water

Where particular company activities are not observable on the day(s) of the audit, interview workers as a replacement for the particular observations, scoring as observation and clearly noting the scope of the method substitution in the audit note.

#### Audit Note:

Lockout, manual tree falling, commercial vehicles, respiratory protection, high hazard materials, working at heights, combustible dust, hot work and confined space do not apply to A&A. Working around heavy machinery applies only to the extent that A&A may be supervising operations on a contrcator/Prime Contractor's worksite where heavy equipment is active. Observations of active logging/road construction sites during the 2023 EMS/SFM/CoC internal audit were 100% positive with respect to communicating with contractors prior to entering active worksites and wearing all required PPE on those worksites as well as other openings/roads where operations were not active. Office sign out is shown on a dry erase board and field check-in forms on a clip board in Campbell River and digitally in Vancouver with the auditor copied the field check-in form/maps during the 2023 EMS/SFM/CoC audit.

All observations were of a positive nature which is consistent with A&A's OH&S program rules and the company's culture. As a result of 100% positive observations of staff at the two office sites and 11 field worksites ten points were awarded.



D3.2	What is the method for supervisors, workers and contractors	0	D	I	Total
#19	to manage unforeseen hazards?	7	2	1	10
		0-7	0-2	0,1	/10

Intent: The company needs to ensure that hazards under the company control are being managed (i.e. how does the company instruct its contractors to manage hazards and when, how and if they report back to the company). This needs to address unforeseen hazards – the issues not in the plan that come up during work and help discourage "production-first" attitudes. This is not intended to include matters solely under the control of the contractor.

The company needs to have a process that includes how to detect, document, communicate and control the hazards. The process may permit less-significant hazards to be controlled without requiring documentation of the hazard or action. Examples might include field level risk assessments, RADAR or simple verbal reporting. **O** - Award up to 7 points based on % observation of good practices in managing and controlling hazards on site.

- **D** Award up to 2 points based on % of completeness of a process for identifying and reporting hazards appropriate to the company risk and complexity.
- **I -** If at least 70% of interviewed workers are able to describe how a significant hazard that they detected would be reported to the company, award 1 point.

#### Audit Note: (Documentation only for **Endorsement**)

Clear communication is A&A's primary method for identifying and communicating hazards. Communication occurs through several means and addresses known hazards as well as previously unknown hazards. The OHSP manual at sec. E.8/Hazard Identification and Risk Control describes the RADAR method (with a hyperlink to the BCFSC website RADAR section) as the official means for identifying hazards, both known and unforeseen and estimating risk/applying controls. Observations at the offices showed hazards controlled including:

- controlled reception areas where visitors are oriented to the offices,
- housekeeping activities that have addressed tripping/falling hazards,
- available first aid and communication equipment in the offices and for the field to address emergency situations,
- vehicles equipped with emergency response equipment should it be required when travelling to/from the field.
- sign-out/check-in forms posted on a clip board in the Campbell River office/digital in the Vancouver
  office.

As a result of 100% positive observations of consistent practices that follow the OH&S program direction and are intended to control hazards seven points were awarded.

Documents that identify hazards and communicate them to contractors and to A&A staff/consultants are primarily the pre-work form and the Tailgate Safety meeting forms. A&A uses their monthly safety meeting forum to identify new/existing and uncontrolled hazards and communicate them to staff who can, if required, communicate the information to contractors/consultants. The review of the network safety folders revealed consistent pre-work meetings with contractors and consistent Tailgate Safety meetings with A&A staff/consultants when engaged with A&A filed by project. In addition, the monthly safety meeting minutes provide evidence of hazard communication. As a result of consistent, documented hazard communication two points were awarded.

The interviews with 14 workers provided a unanimous statement that any identified hazard would be either immediately dealt with, if possible, or verbally reported to a supervisor or the safety coordinator with some interim control put in place (i.e. signage/other) until a final control could be implemented. As a result of 100% positive responses received one point was awarded.



D3.3	Are the on-site first aid personnel, supplies and equipment	0	D	I	Total
#20	adequate and based on a completed first aid assessment?	8	2		10
		8-0	0-2	0	/10

Intent: Having the appropriate emergency response equipment and personnel for the site activities shows that the company is committed to being prepared and values the people on site.

**O** - Award up to 8 points based on % observations of appropriate first aid personnel, equipment, supplies and services for the site.

Appropriate, in this case, means whichever is the higher standard of company or regulatory requirements. Personnel need to be evaluated for number and level at the time of the audit.

Equipment and supplies being complete and in good working condition.

First aid kits need to be sampled for location, accessibility, completeness, condition and usability of contents. Supplies, such as oxygen and Automated External Defibrillators (AEDs), need to be sampled for correct storage, volume/charge and accessibility

Emergency Transport Vehicles (ETVs) and major equipment need to be evaluated for operability and location on the work site for appropriate time/distance to workers being served by that equipment.

**D** - Award up to 2 points based on % of completed, correct First Aid Assessments in the last year compared to those needed.

Assessments are needed for:

- Fixed facilities such as shops, offices, warehouses, processing facilities
- Field sites
- Mobile sites (worker transportation and solo drivers)

A company may supply supporting logic to justify grouping assessments due to similar situations. Examples include a single assessment covering all log transport vehicles or all survey sites in a local geographic area

#### Audit Note: (Documentation only for **Endorsement**)

Each office has a level I first aid kit and land lines as well as staff cell phones. Vehicles are equipped with level I first aid kits for solo drivers/multiple staff as well as road radios (some handheld and some hard wired in the truck). Field layout crews maintain dry bags with a level I kits, blankets and other survival equipment at known locations/helipads with examples in the offices and reference made in Tailgate Safety Meetings during the 2-23 EMS/SFM/CoC audit. AED's are present, charged and inspected in the Vancouver and Campbell River offices and documented as such on the formal office inspection worksheets. A&A does not use or require oxygen equipment or ETV's but has added TEAAM's as a resource for field worksites given most are only accessible via water or air and field work occurs prior to road building so an ETV is not a possibility. A&A has a designated first aid attendant in each office with multiple level I tickets given all field staff are required to maintain their level I tickets five tickets lapsed due to the pandemic. First aid kits sampled included the additional COVID-19 contents (nitrile gloves/face masks/safety glasses and face shields). As a result of first aid equipment that exceeds legal requirements in all cases with AED's in Vancouver and Campbell River with survival kits for field work with no first aid equipment lacking, 100% positive observations yielded eight points being awarded.

A&A completes first aid assessments annually for the offices (Vancouver/ Campbell River/Sandspit) and for field worksites and are dated January 11, 2023. The office assessments identify <20 minutes to a hospital in Vancouver and Campbell River and > 20 minutes given water travel via BC Ferries is required from Sandspit to Daaging Giids. The field assessment indicates ≤ 15 people at any one time with groups of 1, 2-5 and 6-15 and a low hazard for offices and a moderate hazard for field worksites. TEAAM's addresses the ETV kit requirements as described above. The assessment identifies a level 1 kit is required for each level of people with a level 1 first aid attendant. As a result of first aid current and complete first aid assessments with the field assessments augmented by assessments on the Tailgate Safety Meeting forms two points were awarded.



D3.4	Are there communication devices readily available and	0	D	ı	Total
#21	effectively used?	10	0	0	10
<b>-</b>		0-10	0	0	/10

Intent: This is a key issue for routine communications, not just emergency response. Without communications, the company system simply cannot work.

**O-** Award up to 10 points based on the % of workers being served by appropriate readily available and functioning communication devices and being able to use them effectively in their particular setting (i.e. cell service or radio range must be included).

Communication devices include, but are not limited to:

- Radios
- Cell phones
- Land line phones
- Satellite phones
- Whistles
- Horns, bells and alarms, including manual fire pull stations
- Voice, where distance and background noise permit

The auditor must test a sample of communication devices if they are not otherwise observed in action to award the points. Testing of fire alarm bells or evacuation devices may be accomplished by reviewing test records rather than activating the alarm.

Having multiple workers share a communication device is acceptable as long as all workers in that group remain within verbal communication range with consideration for ambient noise, distance, terrain/layout and weather. For helicopter evacuation, there must be a method of communication with the pilot.

For ETV or industrial ambulances, there must be a method of communication between the driver and Attendant.

#### Audit Note:

All offices have land lines and staff have company cell phones. Each office has satellite phones that can be signed out for locations where radio contact or cell phone contact is not available. Field staff carry hand held radios to communicate with each other in the field and with equipment/aircraft/water taxis. All field crews and solo workers have an InReach device. Observations of staff using land lines and cell phones during the BASE and EMS/SFM/CoC audits. In addition, examples of confirming check in via email were confirmed. Radio communication was confirmed during the 2023 EMS/SFM/CoC audit on the roads/cutblocks as well as a field sign out/check in. As multiple forms of functional communication were observed and are available for field/office staff to communicate effectively ten points were awarded.



D4. Safety Training						
D4.1	How are employees, contractors and visitors being provided	0	D	I	Total	
#22	with an appropriate orientation that meets company and	5	3	2	10	
	regulatory requirements?	0,5	0-3	0,2	/10	

Intent: The company needs to ensure appropriate orientation for the audience, including young workers, new workers, different languages and literacy levels. This applies to both the company orientation and any necessary site-specific orientation.

- **O** If the auditor was oriented to the company operations in general and to each different work site visited, award 5 points.
- **D** If there is documentation evidence that at least 90% of all workers, including workers of dependent and non-dependent contractors and visitors, receive orientation on or before the first day of work, award 1 point. Award up to 2 points based on the % of orientation forms including all regulatory and company requirements. If the company has not hired any new or young employees in the scope of the audit, a review of the template or form is acceptable.
- I If at least 90% of interviewed young and new workers confirm orientation on or before the first day of work, award 2 points.

New workers include new hires, Return-to-Work cases and reassigned or transferred workers. Young workers include any person under age 25.

Workers include workers of the company, of dependent contractors and of non-dependent contractors. If there are no new workers in the scope of the audit, interview a sample of workers hired in the last 5 years. If there are no new workers hired within the last 5 years, interview managers and supervisors for knowledge of the system and its applicability to future new workers.

#### Audit Note: (Documentation only for Endorsement)

The auditor was oriented to both the Vancouver and Campbell River offices and the Haida Gwaii office and Haida Gwaii/Sunshine Coast field audit sites in the 2023 EMS/SFM/CoC audit. As a result of consistent orientations five points were awarded.

The network safety files were reviewed and orientations were available for all staff interviewed with the exception of one. Orientations were reviewed and show the orientation occurred at the start of their work on the first. The orientation form is based on a legacy BCFSC form that has been updated to reflect legal requirements and A&A's program. As a result of 17 of 18 (94%) staff/dependant contractor orientation forms located on the network that exceeds the the threshold of 90% and a compliant orientation form three points were awarded for both conditions.

Interviews with two new hires in the last five years confirmed a review of the OHSP and full orientation on the first day of work. As a result, 100% positive responses that exceeds the threshold of 90% two points were awarded.

#### Recommendations and Resources:

**OFI #4 –** A&A must either locate the missing orientation sign off form for the dependant contrcator quality control worker or create an orientation form indicating the date the original orientation was completed noting the worker confirmed an orientation occurred several years ago.



D4.2	How does the company provide employees appropriate safety	0	D	ı	Total
#23	training geared towards their specific work activities and provide		5	5	10
	refresher training?	0	0-5	0-5	/10

Intent: Without training, both initial and ongoing, there can be no expectation that the workers will know anything. Appropriate safety training needs to include considerations for new workers, young workers and those with different languages and literacy levels.

**D** - Award up to 5 points based on the % of sampled workers and supervisors with current, appropriate initial and ongoing safety training records.

Sample workers and supervisors by examining a selection of training records. This must include first aid, PPE, inspection processes, driving, WHMIS, Fire Safety Training, spills, working from heights, manual falling and working near high voltage electrical transmission lines, respiratory protection, confined space entry and rescue and other high risk activities as appropriate for activities. Other topics may include topics such as EMS, Training topics can be both technical skills and the soft skills such as hazard awareness and use of degraded imaging.

**I -** If at least 90% of interviewed supervisors are aware of what training is required for which tasks and are ensuring only appropriately trained workers perform those tasks, award 2 points.

If at least 90% of workers are aware of and have received the training necessary for their assigned tasks, award 3 points.

#### Audit Note: (Documentation only for **Endorsement**)

A review of 14 workers and two supervisors training records revealed the requisite training as identified by A&A was current. Training includes WHMIS 2015, s100/a for field staff, level I first aid/TE for field staff and OHSP/IM-RTW training. Additional incident investigation training occurred for supervisors and JOH&S members with all JOH&S members having the committee training competed with new members in the process of completing a series of on line courses noting the new members were added in January 2023 (three months into committee membership). As a result of consistent training (i.e. 100% conforming) and updated as required five points were awarded.

The two supervisors interviewed were cognisant of required training inclusive of first aid, wildfire and safety program training. As a result of consistent responses from the two supervisors two points were awarded. Interviews with 14 workers provided 100% positive responses with respect to required training for both office positions and field positions. As a result of 100% consistent responses received three points were awarded. Recommendations and Resources:



D5. Safety Communication					
D5.1	How are workers and contractors encouraged to participate in	0	D	ı	Total
#24	discussion and resolution of current and ongoing health and	2	1	7	10
	safety issues?	0-2	0-1	0-7	/10

Intent: Those affected by the company program need to be able to quickly discuss safety issues. If the company includes contractors in its safety program, then the contractors also need to have a mechanism. There is no intent to require a company to give a voice to contractors who are not involved in the company's safety program.

- **O** Award up to 2 points based on the % observations of the last 3 safety meeting minutes <u>and</u> where applicable JOHSC meeting minutes being posted or otherwise made available to all workers. Scoring is to be based on the % of workers and contractors with access to the applicable minutes. For example, if 80% of workers could access all minutes, award 2 points, while if 80% of workers could only access half the minutes, award 1 point.
- **D** If safety meetings have been held in at least 75% of operating months in the previous 12 months, award 1 point.

The scope of these safety meetings is different from JOHSC meetings. They are intended as all-employee meetings. It is not necessary for all employees to physically meet. Telephone, radio and/or video aids may be used and it is not necessary that all workers attend the same meeting. It is expected that not all employees are able to attend all meetings, but there must be a mechanism to pass meeting information on to absent people. The minimum frequency of these meetings is to be monthly during operating months. More frequent meetings such as site-specific, new-project, one-on-one, weekly or daily meetings also meet the requirements of this question provided the meetings are documented.

- **I -** If at least 70% of interviewed workers confirm existence of the monthly (or more frequent) meetings and their personal attendance at all of those meetings or having meeting information passed to them after the meeting, award 2 points.
- I Award up to 5 points based on % of worker (and contractor where contractors participate in committees) interviews reporting active worker participation in the discussions, specifically including resolution of issues. The workers do not need to be able to cite specific examples for a positive finding.

#### Audit Note:

All monthly safety meeting minutes and the JOH&S Action tracking worksheet are available on the sharepoint site. A&A has one monthly safety meeting with Campbell River and Sandspit joining Vancouver via video conference. As a result of making all safety meeting minutes available to staff through electronic means two points were awarded.

Monthly safety meetings were available for all months during the audit period (September 2022 – April 2023 with the auditor attending the Aoril safety meeting) with the safety meeting continuing to be scheduled on the first Monday/business day of each month. As a result full points were awarded.

Interviews with 14 workers confirmed monthly safety meetings with mandatory attendance unless away from the offices for bona fide reasons. As a result of 100% positive responses received two points were awarded.

Interviews with 14 workers confirmed monthly safety meetings with all staff participating/encouraged to participate with specific topics areas where staff provide updates. As a result of 100% positive responses five points were awarded.



D6. Reporting and Investigating Incidents					
D6.1	How are incidents, including near misses / close calls being	0	D	I	Total
#25	reported to the company and to the relevant authorities or		5	5	10
	agencies that have jurisdiction?	0	0-5	0-5	/10

Intent: The company needs to consider how workers report to the company and the company to authorities. Near miss / close call reporting for workers is a key method for improving company safety performance. This is not intended to include workers knowledge of injury claim reporting to authorities.

**D** - Award up to 2 points based on % of completeness of instructions for reporting to relevant authorities for types of incidents that could reasonably occur in the scope of company operations.

Types of incidents may include, but are not limited to:

- Near misses and close calls
- Minor injuries requiring medical treatment (and/or other WSBC claim parameters)
- Serious injuries
- Fatality
- Structural Failure/Collapse
- Major release of a hazardous substance
- Motor vehicle accident on public road
- Motor vehicle accident on forest service road
- Motor vehicle accident on other forestry road (on public or private land)
- Power line contact
- Explosives handling incident
- Fire

Relevant authorities depend on the company's activities and location. They may include, but are not limited to:

- WSBC (fatality, serious injury, claim, hazardous occurrence, etc.)
- BC Safety Authority (boilers and pressure vessels, etc.)
- BC Hydro or local power provider (power lines)
- Ministry of Environment (specified spills)
- Ministry of Forest and Range (wildfire and other issues)
- Ministry of Transportation (certain vehicle incidents)
- ICBC (certain vehicle incidents)
- ESDC / Transport Canada (certain aircraft and watercraft incidents)
- Clients and licensees (meeting contractual obligations)

The intent of this guestion would be satisfied with a list of parties to notify in different cases.

**D** - If documentation (first aid records, incident reports, maintenance records, reports to authorities, etc.) is positively correlated to indicate all incidents are reported to the company and where necessary to authorities and agencies, award 3 points.

If the company had no reportable incidents in the audit scope, score these second 3 points only as 'N/A' and adjust total accordingly.

**I -** Award up to 4 points based on % of positive responses of interviewed workers being aware of, and following, reporting procedures.

If 80% of supervisors or managers who have responsibility for external reporting understand that responsibility, award 1 point.



#### Audit Note for question on previous page:

Sec. J/Emergency Response provides reporting direction for the types of incidents defined in each ERP including:

- missing person designated check-in person contacts appropriate Woodlands staff (closest to know location),
- the pre-arranged helicopter company, TEAAM's and the Rescue Coordination Centre if that fails for aerial medical evacuations.
- the emergency team leader for medical ground evacuation where the injured worker can walk out,
- the A&A emergency contact person for missing persons (as per the check out procedure and directed to call the RCMP/SAR where required),
- A&A safety coordinator for fatalities who is directed to contact the RCMP and WSBC.
- Supervisor for an earthquake and follow the appropriate evacuation procedure,
- Supervisor for Tsunami's,
- No reporting for lightning storms unless an incident and then follow the appropriate ERP (provides direction on what to do to avoid injury),
- Landslide/erosion, flood and fire MoFLNRO,
- Spills PEP.
- Road hazards Nechako NorthCoast (handles DriveBC). Note this number is repeated for all ERP's and is not specific to the different area.

Powerline hazards are dealt with specifically in contractor pre-works with BC Hydro attending and determining the limits of approach and controls to be used when powerlines are near field worksites. As the reporting instructions are comprehensive and reasonable for the types of emergencies the company may have to deal with two points were awarded.

A&A had one WSBC reportable incident (medical aid ankle roll on a steep slope) during the six month audit period. WSBC reporting was confirmed for the medical aid incident with all records maintained in a confidential file in the Controller's office. A&A is working on a close call/non-serious injury short form to stimulate reporting as recommended in past audits noting no close calls were reported by A&A. As a result of consistent reporting within A&A with one incident that required WSBC reporting (i.e. form 7) three points were awarded.

Interviews with 14 workers (14/14=100%) revealed a clear understanding of incident reporting procedures inclusive of reporting where it is a contractor/consultant incident involved with A&A. As a result of the consistent responses received four points were awarded.

The interview with the safety coordinator/JOH&S committee member revealed she understands the responsibility and as a result, one point was awarded.

#### Recommendations and Resources:

**OFI #5** – A&A may wish to review the notion of Serious Injury and Fatality Potential (SIFP) as a means to screen incident/close call reporting and dedicated time/resources to SIFP incidents and report non SIFP incidents/close calls for information and awareness only. This may be a means of stimulating close call reporting as staff will not be subject to the in depth/detailed investigation process for non-serious injuries/close calls. More detail can be found at <a href="https://www.sifpotential.com/">https://www.sifpotential.com/</a>.





D6.2	Are all reported incidents effectively investigated by the	0	D	ı	Total
#26	company?		5	5	10
		0	0,5	0-5	/10

Intent: Appropriate investigations maximize learning and prevent recurrence. This is not intended to require formal investigation of all paper cuts as that would not be appropriate, nor maximize learning.

**D** - If at least 90% of total incidents have an investigation report appropriate for the severity of the incident, award 5 points.

The minimum level of investigation for any reported incident is a preliminary informal review by the supervisor to determine if a more serious investigation is warranted. For the more significant investigations, worker participation should be included.

**I -** Award up to 5 points based on the % of positive responses from interviewed workers and supervisors stating all reported incidents are investigated.

Audit Note: (Documentation only for **Endorsement**)

A&A had one reportable incident during the six month audit period as identified in question D6.1. The medical aid incident had a report with a full investigation with evidence limited to injured person/staff witness statements. The incident was reviewed with A&A staff for learning potential at the monthly safety meeting. As a result of investigation of the incident with no close calls noting support is provided to contractors for their incident/serious close calls five points were awarded.

Interviews with 14 workers and two supervisors were unanimous with respect to both understanding the incident reporting procedure and that all/any incidents are investigated commensurate with the severity of the incident/close call. Responses included helping contractors with their incidents inclusive of WSBC reporting where required. As a result of 100% positive responses received five points were awarded.



<b>D7.</b> En	D7. Employee Engagement						
D7.1	What process does the company have to ensure	0	D	I	Total		
#27	managers, supervisors and lead hands have appropriate		2	8	10		
	skills to effectively manage people for safety?	0	0-2	0-8	/10		

Intent: This is a key cultural question that shows leadership commitment to success and recognizes that effective supervision is key in all areas. Supervisors need to have the ability to manage key human factors affecting safety. This could include catching when people are 'off', rushing, fatigued or complacent.

- **D** Award up to 2 points based on the % completion of records showing that supervision is being provided to all workers with a frequency appropriate to the scope, complexity and risk of the tasks. Potential records include, but are not limited to, supervisor diaries, notes, inspections and assessment reports.
- I Award up to 8 points based on % positive responses from interviewed senior managers, managers and supervisors being able to consistently describe how supervisory (including lead hand, team leader, relief supervisor, etc.) competence is ensured.

Positive practices may include, but are not limited to:

- Formal or in-house training and/or mentoring
- Coaching and evaluation of supervisory practices
- Documented competency evaluations of the supervisor by management and/or workers
- Hiring standards
- Assignment of duties to allow appropriate time for supervisory tasks

Desired topics of competence include, but are not limited to:

- Coaching skills
- Human factors knowledge
- · Techniques for detecting and managing workers who are acting 'off'
- Soft skills for supervisors

#### Audit Note:

A&A's primary supervisory documentation tool is the worker assessment based on the legacy BCFSC worker assessment form with modification for A&A's purposes as well as the Young Worker Assessment form used with new and young workers. Worker assessments were available for 37 of 39 staff. A&A revised the Worker Assessment form creating an Office/Administration assessment form in 2018 and adjusted the field worker form in 2019 to allow a record of inflatable pfd inspection/repair that was consistently completed in the 2023 assessments. In two cases the assessments did not shoe review/approval by the supervisor. As a result of 37 assessments for 39 staff in half the year with the next series if assessments not due until the summer of 2023 not yet overdue, 37/39=95%(2)=1.9 rounded to two therefore two points were awarded.

Interviews with the VP Operations, General Manager, two supervisors and nine workers who supervise, direct, inspect contractors/consultants and manage projects with multiple A&A staff revealed that competence assessments begin with the orientation followed by required and ongoing training/checks of existing training, work experience with observation by direct supervisors/managers and mentoring by direct supervisors/managers for inexperienced workers at a more frequent rate along with informal observation and discussion/review are the primary means to assess competence. In addition, formal worker assessments are completed by supervisors/managers on their reports as a documented and formal assessment of competence. As a result of 100% positive response for understanding the informal and formal methods of assessing competence eight points were awarded.



D7.2	Does the company promote and encourage timely two-way	0	D	ı	Total
#28	communication for workers and contractors to speak up about			10	10
	perceived unsafe work procedures, practices or conditions?	0	0	0-10	/10

# Intent: A culture of 'speaking up' is a key safety indicator. While it includes the 'right to refuse' it also involves the 'right to participate' in the resolution of safety issues.

I – Award up to 10 points based on interviewed workers (and where reasonably available contractors) reporting they have the ability to raise all real and perceived safety issues and that such reporting would be well received and satisfactorily addressed. This includes new, young and front-line workers reporting a senior worker or supervisor either engaging directly, or directing others to engage, in what they believe are questionable practices.

Interviewed Workers and Contractors need to report a process to manage unsafe work (or asking for assistance when out of their personal depth) by:

- The worker reporting the issue to their supervisor
- Jointly developing a solution acceptable to both the worker and supervisor

The process described may or may not progress to the involvement of the JOHSC and/or representative and/or WSBC. The intended focus is the internal company processes and the comfort of the worker with managing perceived unsafe work as-given. The intent of the question is to provide a mechanism that is faster than waiting for the next scheduled meeting.

#### Audit Note:

Interviews with 14 workers revealed a consistent, 100% positive response to A&A's culture where they are expected to walk the walk and set an example for co-workers and their contractors. With respect to unsafe acts/conditions the response received was to identify/discuss with the responsible worker and depending on the response received, report upward although they all indicate this has not occurred. As a result of 100% positive responses received ten points were awarded.

D. Doing the Work Well – Scoring Summary									
	Awarded	Available	N/A	Available – N/A	% awarded				
Total	150	150	0	150	100				



C. CHECKING FOR SAFE WORK						
C1. St	pervisor Oversight					
C1.1	How are supervisors monitoring the health and safety	0	D	I	Total	
#29	of all workers and contractors under their direct	2	2	6	10	
	supervision and ensuring they operate within limits?	0,2	0-2	0-6	/10	

Intent: Actively monitoring workers is part of a commitment to accountability at all levels. Supervisors pro-actively engaging with workers, rather than just passively watching, leads to superior safety results.

- **O** If 100% of observations of supervisors show that supervisors are ensuring workers and contractors are following safe work procedures, specifically including intervening where workers or sub-contractors are observed by the supervisors not to be following safe work procedures, award 2 points.
- If no interventions are necessary, evaluate based on % good supervisory techniques, such as observing and coaching workers, inspecting the site and directing the correction of deficiencies.
- **D** Award up to 2 points based on the % completion of records showing that supervision is being provided to all workers and contractors with a frequency appropriate to the scope, complexity and risk of the tasks. Potential records include, but are not limited to, supervisor diaries, notes, inspections and assessment reports.
- **I -** Award up to 3 points based on % interviewed workers and supervisors reporting appropriate supervisory presence (i.e. frequency and duration) and communication of known and foreseeable hazards at the work site.
- **I** Award up to 3 points based on the % of positive responses from interviewed supervisors understanding the applicable legal and regulatory requirements, company safety standards and control measures required for evaluating work activities. This is intended to evaluate aggregate supervisor knowledge, so if 4 of 5 supervisors fully understand and 1 understands 50%, this would be 90% positive.

#### Audit Note:

Observations of two supervisors were office based with no need for intervention. As A&A's staff are primarily Qualified Registered Professionals (QRP's) in the accounting and forest/environment fields and follow the safety rules with any exceptions being primarily lapses not intentional deviation. Workers who act as project managers were also observed however again in an office environment with no need for intervention/correction. Safety observations made during the March 20-24, 2023 EMS/SFM/CoC audit did not identify situations where correction wad required. Interactions were complimentary with dialogue and issue review the primary purpose. All staff work deliberately and purposefully without rushing. As a result of 100% positive supervisor observations two points were awarded.

Supervisory documentation includes the worker assessments with documentation 37 of 39 (95%) staff members for 2023 YTD. Beyond that supervisors and workers who are project managers prepare pre-works and tailgate meetings which provide direction for staff and contractors/consultants. Correction is documented on inspection forms (i.e. Safety Inspection form) at the start of projects and are to continue monthly with initial safety inspections that identify deficiencies which are followed up until corrected. In addition, the monthly safety meetings provide an update of all ongoing operations and identification of any deficiencies and actions A&A need to take with a follow up the next month. As a result of consistent documentation (worker assessments, pre-works, tail gates, contractor review/inspections, monthly safety meeting minutes) that demonstrates supervision is being provided two points were awarded.

Interviews with 14 workers and two supervisors were positive with respect to indicating adequate supervision and A&A presence occurs for both staff and contractors/consultants as identified throughout this report and that the pre-work/tailgate meeting process is the primary conduit for communicating hazards with follow up meetings as required. In addition, field staff indicated they are cognisant of the role of the Prime Contractor and ensure they check but do not direct Prime Contractors. As a result of 100% positive responses received three points were awarded.



Interviews with the two supervisors and nine workers who manage, direct and/or inspect contractors/consultants and supervise other workers revealed a clear understanding of legal requirements, A&A's OH&S program requirements and the use of appropriate controls to manage risk. In addition, responses indicate A&A will bring in outside experts to aid with inspections in specialized areas to help with time management issues for staff to ensure the safety aspect is dealt with in a timely manner. As a result of 100% positive responses received three points were awarded

#### Recommendations and Resources:

**OFI #6** – Given the discussion regarding the monthly frequency of contractor safety inspections versus a risk ranking to drive inspection frequency A&A may wish to consider a results based inspection frequency whereby as checklists/inspections reveal conformity/compliance further inspections are not required or the frequency relaxed and where checklists/initial inspections reveal deficiencies inspection frequency is not relaxed and continues at least the monthly frequency. Such a change could reduce time spent by A&A on operations that comply/conform dedicating resources to those contractors that are struggling to comply/conform.



C2. In	spections				
C2.1	Does the company conduct inspections in accordance with	0	D	I	Total
#30	an outline of what is to be inspected, at what frequency,	6	2	2	10
	and by a competent individual?	0-6	0-2	0-2	/10

Intent: The company needs inspections to prevent things going wrong. Doing it properly shows leadership follow-through.

**O** - Award up to 6 points based on the % of observed equipment, facilities, materials and sites having any evidence of appropriate inspections based on either the object being either safe for use or removed from service.

- **D** Award 1 point if all the following topics are covered in the inspection program:
  - Equipment
  - Facilities, including camps and other remote accommodations under company control
  - Materials (i.e. supplies such as explosives, fuels and raw materials)
  - Worker (and contractor where applicable) activities and practices; (specifically including any company high risk activities)
  - Site conditions (specifically including company high risk activities).

Topics must define the frequency of inspection and have an overall statement of intent and involve workers in performing the inspections.

- **D** Award 1 point if all inspection frequencies are shown to occur at intervals that can reasonably be expected to prevent the development of unsafe working conditions AND the inspections are performed by competent (or where required by law or regulation qualified) individuals. If a company is not performing an inspection at the frequency required by law or regulation, this is a negative finding.
- I Award up to 2 points based on % of interviewed workers stating that inspections are done on time, by competent (or qualified where required by law or regulation) individuals and to the appropriate depth.

#### Audit Note: (Documentation only for **Endorsement**)

Observations of the offices (inner office/outer building and office equipment) and vehicles (exterior and interior as well as equipment in vehicles) did not reveal instances of outstanding maintenance/repair. Observations of field gear and emergency equipment (first aid kits/fire extinguishers, etc.) revealed newer equipment stored appropriately in the offices and in the vehicles. As a result of 100% positive observations of both offices, two vehicles and 11 field worksites six points were awarded.

The OHSP document at sec. F/Inspections of Premises provides direction on inspections and indicates the intent of inspections is, "...detect and control of workplace hazards and risks....". The inspection program covers: roads, cutblocks, buildings/structures/offices, grounds, tools, equipment, field layout and work methods and practices. Vehicles have a separate paragraph but are understood to be included in equipment. The section defines the inspection interval for vehicles and offices. Logging/road building site inspections are completed by the logging supervisors on a frequency based on risk as defined in WOP-09. Vehicle operators complete per trip/per-use, undocumented inspections of vehicles with service provider mechanical inspections at PM/repair intervals (generally 5,000 - 8,000 kms depending on the manufacturer). Office inspections occur annually with undocumented monthly inspections with an inspection frequency that is commensurate with the low risk. Workers and supervisors are formally inspected bi-annually with observation/inspection daily by the supervisors in their normal course of work. Inspections are completed by qualified registered professionals. All inspections are completed at intervals that are consistent with the OH&S regulation and the level of risk and as a result, two points were awarded.

Interviews with 14 workers were positive with respect to inspections of offices, vehicles and field worksites being completed on a consistent basis by A&A staff who are competent and identify deficiencies which are then corrected. As a result of 100% positive responses (i.e. 14/14=100%) received two points were awarded.



#### Recommendations and Resources:

OFI #7 – While A&A has a functional inspection program they may wish to consider how they communicate back to staff and in particular where they are not in control of the corrective action. By way of example the roof leak in the Vancouver office is expected to be repaired by the property manager however office staff are unaware of who, when and how. Simple communication of when the repair is expected with indication that A&A has contacted the property manager for repair will provide office staff with information so they are not left wondering if the repair will be completed and if there are any adverse health affects as a result of the roof leak.



C3. Che	C3. Checking Competency								
C3.1	What process does the company use to ensure workers are	0	D	ı	Total				
#31	competent to perform their assigned tasks?		3	7	10				
		0	0-3	0,7	/10				

Intent: People should only be doing work that they are trained to do and are competent to do. Competency is different than training – it is observation and feedback to the worker on how they are performing the job. While having worker signatures on evaluations is preferred, it is not required.

**D** - Award up to 3 points based on the % of worker and supervisor competence assessments completed compared to the number of workers and supervisors.

Every worker and supervisor (once they have completed training) must have a documented competence assessment for their current position or assigned tasks. Ongoing assessments are required and the frequency should be based on the risk of the tasks being performed and the skill (including age and experience) of the particular worker. Competence assessments must include observation of the persons performing the tasks. Competence assessments may include, but are not necessarily limited to:

Training and practical examination records

Certificates supported by observation content

Supervisor journal notations

Assessments

Inspections

I - If at least 90% of interviewed supervisors and managers are:

knowledgeable about the company program and regulatory requirements assessing workers in accordance with company and regulatory requirements, award 7 points.

If managers also assess workers, include applicable managers in the interview sample size.

If all supervisors are also managers, exclude supervisor assessment from the question.

Workers are limited to company workers and exclude contractors.

#### Audit Note: (Documentation only for Endorsement)

Worker assessments are the primary form of competence assessment as referred to earlier in this report. The worker assessment form is focused on field workers as office workers do not face the same hazards or level of risk that field workers do however they are also completed for office staff using the office/administration worker assessment form. Worker assessment forms were available for 37 if 39 staff as identified earlier in this report. The training matrix identifies completed training and orientation forms demonstrate orientation to the OHSP at hire with annual reviews/sign offs. Orientations and training were complete on or before the first day with the one exception identified and addressed earlier. As a result of 95% of workers/supervisors/managers having the first of the required bi-annual assessments completed within the first six months of the audit period with very few yet complete but also not yet overdue and current required training completed or scheduled where lapsed with additional worker assessments competed more frequently for some workers three points were awarded.

Interviews with the VP Operations, General Manager, two supervisors and nine workers who manage projects that include A&A workers and supervise, direct and/or inspect contractors/consultant staff confirm they understand A&A's requirement to assess competence, that they do this on a daily basis informally and formally on an annual basis for A&A staff/on a project basis for contractors/consultants via the inspection process. As a result of 100% consistent responses received seven points were awarded.



C4. Communicating Results							
C4.1	How do managers and supervisors regularly share health and	0	D	ı	Total		
#32	safety program performance information relevant to their	2	0	8	10		
	operation with their workers and contractors?	0-2	0	8-0	/10		

Intent: This question is specific to the company sharing performance with workers, as opposed to having a document management system in P5.1. This is a link to the goals in P1.1 and keeping the goals visible and high profile.

**O** - Award up to 2 points based on the % of workers readily having access to performance information. Methods may include, but are not limited to:

- Signs
- Posters
- Mail outs
- Emails
- Presence of content in minutes
- Posting of external reports or other documents, such as those from Primes, Licensees and/or WorkSafeBC
- **I -** Award up to 8 points based on the % of interviewed workers with an awareness of the company safety program and its current key issues.

#### Audit Note:

A&A has moved to a predominately digital format for documents and records stored on the network drive and more recently to a cloud based sharepoint accessible to all staff anywhere as long as an internet connection is available. Observations completed during the office tours, during interviews and via the sharepoint/network access showed all staff have access to A&A's network safety folders and sharepoint site where all documentation is maintained. As a result of 100% consistent access to OHSP records/documents two points were awarded.

Interviews with 14 workers revealed a consistent understanding of the safety program and its requirements. Current issues continue to be documented in the monthly safety meeting minutes and JOH&S action tracker as identified by workers. As a result of 100% consistent responses eight points were awarded.



C5. In	C5. Investigation Quality							
C5.1	How does the company properly complete investigations to lead	0	D or I	Total				
#33	to recommendations to prevent reoccurrence?		10	10				
		0	0-10	/10				

Intent: Investigations are key to preventing reoccurrence. Investigation needs to lead to preventing reoccurrence, not just stop at causes. Only if investigations lead to meaningful corrective actions will the rate of fatalities and serious injuries drop. While there are several investigation questions in this report, this question focusses only on the recommendations from the investigations.

Verify by documentation if the company has any incidents that have been or should have been formally investigated.

Verify by interview only if the company does not have any incidents that have been or should have been formally investigated.

#### Do NOT use both methods.

- **D** Award up to 4 points based on the % of completeness of evidence collection as appropriate for the incident. Evidence collection will usually, but not always, include:
  - Events leading to the incident
  - · Conditions of the work environment, tools, equipment and employees
  - Witness statements (if any witnesses)
  - Photos, diagrams and/or sketches
  - Reports on relevant employee training
  - Applicable safe work procedures
  - Emergency response actions
- **D** Award up to 4 points based on the % of completed investigations with applicable fundamental recommendations to prevent recurrence compared to investigations completed.
- **D** Award up to 2 points based on the % of investigators of the sampled investigations having formal training. The investigation needs to use any standard investigative method to dig to the deeper system causes of an event in order to make fundamental recommendations. While addressing symptoms or immediate causes is important, it alone is insufficient for a positive finding. Worker participation is required unless impracticable.
- I In the absence of completed investigations due to a lack of incidents of sufficient severity for a formal investigation, this question may be evaluated through interview of investigators being able to explain how to investigate incidents using a form that has an ability to lead to preventing reoccurrence (i.e. evaluating their training and capacity). This method is particularly applicable to small and/or low-risk companies. Award up to 10 points based on the effectiveness of the individuals who would reasonably be investigating (by either company or regulatory requirements i.e. must include worker JOHSC members) being able to explain the basics of investigation processes.



Audit Note for question on previous page: (Documentation only for **Endorsement**)

A&A had one WSBC reportable incident during the six month audit period. The evidence was limited to a statement of fact from the injured worker and staff members who acted to help the injured worker. Given the nature of the medical aid incident the statement evidence was appropriate noting it identified walking on steep, colluvium slopes without rushing and twisting an ankle after putting the heel down. The statement is broken down into three sections as follows:

- Leading up to,
- During,
- Post incident.

As a result of reasonable evidence collection which was a detailed statement of fact, 100% of the evidence collected in the one medical aid case was acceptable and therefore four points were awarded.

In the incident investigation report the recommendations were basic and concise and focused on a review of field work in steep slopes and the strain it places on joints/muscles. Given the nature of the incident the corrective actions were appropriate in the one incident that occurred (i.e. 1/1=100%) and as a result four points were awarded.

The one investigation was completed by members of the JOH&S committee that are confirmed as having taken an incident investigation course. As a result of the one investigation (1=100%) having trained investigators complete the investigation two points were awarded.



C6. Ch	C6. Checking Multi-Employer Workplaces						
C6.1	If multi-employer workplaces are created by the company,	0	D	I	Total		
#34	how does the company confirm that the workplaces are		5	5	10		
	coordinated and a system of compliance is in place?	0	0,5	0-5	/10		

Intent: Multi-employer workplaces can be managed by the company by assigning Prime Contractor to another company or can be self-managed by being the Prime Contractor. In either case, the company needs to have appropriate oversight of the workplaces in question. The oversight has to balance checking the activities and allowing the other companies on site to manage their own activities appropriately.

## This question is not applicable if the company does not create multi-employer workplaces.

- **D** If documents show that company personnel who should have oversight of multi-employer workplaces are exercising the oversight appropriately for the risks and activities on those worksites, award 5 points.
- **I -** Award up to 5 points based on % of interviewed personnel who should have oversight over multi-employer workplaces able to confirm that they are appropriately evaluating key safety coordination and compliance parameters appropriate to the risk and activities and providing direction based on those evaluations.

## Audit Note: (documentation only for Endorsement)

A&A uses their phase contracts or a Prime Contractor assignment form to transfer responsibilities to Prime Contractors. Transfer is done after an evaluation of the contractor's safety program using the Safety Checklist as referred to earlier in this report for new and existing contractors. Many of the contractors are repeat contractors and therefore A&A has an established relationship and is aware of their safety programs/ability to be a Prime Contractor. Once transferred A&A checks on Prime Contractors and their sub-contractors to ensure all elements of a Prime Contractors responsibilities are being addressed. This is documented on the Safety Inspection form and completed by the A&A employee with responsibility for oversight of that Prime Contractor or camp (i.e. Homathko Camp owned by A&A but managed by a contractor when active). A review of records shows many contractors are assigned Prime Contractor responsibilities, that Safety Checklists are consistently completed to assess both the OH&S program and the contractor's ability to maintain/control activities at the project site and that safety inspections are consistently completed to assess implementation of the Prime Contractors program and completion of their Prime Contractor responsibilities. The monthly safety meeting minutes also provides an update for each active project and makes reference to the last safety inspection and next scheduled safety inspection. As a result five points were awarded. Interviews with two supervisors, the VP Operations, the General Manager and nine workers who manage contractors, some of whom are assigned Prime Contractor responsibilities revealed a clear understanding of A&A's procedures and tools for management of those project worksites. Reference was also made to providing external resources (i.e. inspectors) to help complete safety inspections where issues are complex or staff require additional help to manage the Prime Contractors. As a result of 100% consistent responses received five points were awarded.

C. Checking for Safe Work – Scoring Summary								
	Awarded	Available	N/A	Available – N/A	% awarded			
Total	60	60	0	60	100			



A. ADJUSTING FOR BETTER WORK							
A1. Continual Improvement							
A1.1	How are senior leadership and managers actively	0	D	I	Total		
#35	involved in measuring and evaluating safety		5	5	10		
	performance and evaluating opportunities for	0	0-5	0-5	/10		
	continual improvement?						

Intent: For this important cultural question, leadership must show that they are meaningfully involved in promoting continuous improvement in the operations.

- **D** If documents show managers measure and evaluate key safety performance indicators, award 3 points. Key performance indicators may include, but are not limited to:
- timely completion of safety program activities such as inspections, assessments, investigations and corrective actions
- near miss / close call, first aid, medical aid and time loss statistics
- training and competency assessments
- analysis of records and statistics that determine injury trends such as frequency, nature, type and severity of worker injury

If documents show managers provide directions for continual improvement based on the results of their evaluations, award a further 2 points.

This process is different than managers attending JOHSC or other similar meetings as a participant. This process needs to show that management has a plan for driving change and improvement. There is no intent in the audit to specify what the nature or scope of that plan should be.

I - Award up to 5 points based on % of interviewed managers able to confirm that they are appropriately evaluating key safety performance indicators and providing direction for continual improvement based on those evaluations.

#### Audit Note:

Documentation that shows management reviews safety indicators identified on the annual SIP through monthly safety meetings, the JOH&S Action Tracking worksheet and the specific records supporting the KPI's identified for each objective in the SIP. Minutes demonstrate key safety indicators inclusive of the company goals/objectives are reviewed and assessed regularly with communication to staff through that venue. As a result of consistent documentation five points were awarded.

Interviews with the Operations Forester/safety co-ordinator (JOH&S member), the VP operations and General Manager revealed that safety performance indicators are reviewed at monthly safety meetings and by the JOH&S committee on a regular/monthly basis. For contractors, A&A records MIR however it is understood that this measure is not a full description of contractor performance as many contractors work with A&A for a short duration and any incidents result in an abnormally high MIR based on limited hours with A&A. In addition, training needs are assessed/reviewed as are incidents although A&A continues to have few incidents of low severity as have their contractors during the audit period. As a result of consistent responses to reviewing, understanding and tracking, as required, key safety indicators five points were awarded.



A2. Ad	A2. Adjusting Procedures										
A2.1	How are risk control measures and safe work procedures	0	D	I	Total						
#36	reviewed and updated with worker involvement on a regular		5	5	10						
	basis and when there are changes in work conditions?	0	0-5	0,5	/10						

Intent: The company needs to have a living and evolving management system that adapts to change, not just a dusty manual on the shelf. Workers, since they are most affected by the company program, are the best voice for operational feedback.

- **D** Award up to 5 points based on records showing that risk control measures and safe work procedures are reviewed at least every 2 years and/or updated when necessary. It is not necessary to show that the procedures change every 2 years, only that they are examined to determine if they are still applicable. One-on-one review of safe work procedures with workers is considered acceptable provided there is an opportunity to cause change in the measure or procedure.
- **I -** If at least 70% of interviewed managers, supervisors and workers report that at least some workers are involved in the review process, award 5 points.

It is not necessary for every worker to be directly involved in the process. Worker involvement may be via a committee or representative. However, the interviewed worker must at least be aware how their issue or idea could be evaluated for incorporation into a revised procedure to be considered a positive response.

### Audit Note: (Documentation only for **Endorsement**)

The OH&S program document was updated in 2016 to address BASE 4 requirements with some minor revisions in 2018 to clarify marijuana as a legal substance in the drug, alcohol and fatigue section and again in August 2020 addressing some minor typographical errors. Safety meeting minutes show a review/revision to the JSB including addition of policies (Bullying & Harassment 2015) as well as completion of the Young Worker procedure (2016). 2017 revisions include external guidance documents that include: (1) selecting the frequency of helipads for engineering projects, (2) ongoing revisions to the flight and boat charter lists providing quidance document for staff booking helicopters (size/power vs. crew size as opposed to cost/hr.) and A&A approved carriers, (3) a revised "Working Around Active Operations" field reference card and (4) a new Office/Administration Worker Assessment checklist. The three documents and checklist directly support the OH&S program. In 2018 the revision included addition of an ATV procedure given the Terrace office acquired and uses ATV's noting the Terrace office's closure and that the ATV's is no longer used by A&A. The IM/RTW program revisions in 2019 addressed some audit recommendations. A pfd policy implemented in December 2019. The OH&S program document and JSB were updated June 1, 2022 to revise the check-in procedure to include the requirement to put the check-in documents in the outlook calendar as well as emailing to the responsible person/after hours person with some typographical/inconsequential changes. In 2022 the OHSP manual was updated to include re-assignment if Insafe work as recommended with a significant change being the creation and implementation of a cloud based sharepoint site making access simple and easy for staff at any location. As a result of consistent review/update of the OH&S program document five points were awarded.

Interviews with two managers, two supervisors and 14 workers revealed that the OH&S program/JSB are continually reviewed and when necessary, edited/changed or additional controls added. Staff referred to the monthly safety meeting forum where staff are continually asked for input/suggestions. As a result of 100% consistent responses received five points were awarded.



A2.2	What are the methods in place for reviewing, implementing,	0	D	ı	Total
#37	tracking and following up on the investigation, inspection and	6	2	2	10
	other recommendations?	0-6	0-2	0-2	/10

Intent: The company needs to follow through and show due diligence in addressing corrective actions of any type and learn from experience. The company must allocate sufficient resources for safety.

- **O** Award up to 6 points based on % auditor observation verification that sampled corrective actions have been completed. If there are no recommendations that yielded reasonably observable actions, score the observation portion as not applicable and deduct 6 points from the total.
- **D** If there is a process for tracking corrective actions award 1 point. Having different processes for each of investigations, inspections, etc. is acceptable.
- **D** If at least 90% of documented deficiencies are reported and corrected within established time frames, award 1 point.

Potential records of interest may include, but are not limited to:

- CAL from the previous audit if there was a previous audit (a primary and mandatory document)
- Inspection forms
- Investigations
- JOHSC minutes
- Safety Meeting minutes
- Daily equipment logs
- Maintenance reports
- Monthly inspection reports
- Danger Tree assessments
- Supervisor journals
- Report forms such as RADAR or SafeStart
- 3<sup>rd</sup> party inspections (Prime, Licensee, health or other authority, WorkSafeBC, etc.)

The process may be integral with the investigation form, a separate system or part of an overall company system, but it must include target completion dates and assign tasks to people. Updating target completion dates as situations change is acceptable.

Actions that are not yet due should be excluded from the calculation.

If the company has a system, but has no actions assigned that should have been completed, score the second part of the question as 'N/A' and deduct 1 point from the total. If the concept of due dates is not included in the company system award zero points for Documentation parts of this question.

**I -** Award up to 2 points based on the % of positive responses from interviewed workers stating corrective actions are completed by the target date.



## Audit Note for question on previous page: (Documentation only for **Endorsement**)

Audit findings from the 2022 BASE audit were confirmed as addressed but are not observable actions. The one incident corrective actions are listed on the incident report form and identified as complete but are communications and therefore not observable. In addition, any additional or more complex/time sensitive corrective actions are tracked on the JOH&S Action Tracking worksheet and reviewed as part of their regular meetings. One observable action for Campbell River stemming from an ERP drill included posting the first aid attendant names as well as a service provider tagging fire extinguishers which were observed as complete. Other corrective actions such as ensuring ERP drills are completed are identified in the CAL/safety meeting minutes can only be checked through documentation of the drills. Additional corrective actions identified on Safety Inspections can only be checked through documentation but did show completion.

As a result of a two of two observable actions confirmed as completed (i.e. 2/2=100%) six points were awarded.

As a result of a clear process to track corrective actions to completion two points were awarded.

Interviews with 14 workers (14/14=100%) unanimously state corrective actions are completed in a timely manner and are only delayed when they are more complex and require gathering of information and consideration prior to decision making. As a result of 100% positive responses for completion of corrective actions in a timely manner two points were awarded.



A3. Adjı	3. Adjusting Emergency Response											
A3.1	Are appropriate drills being conducted to periodically test and	0	D	ı	Total							
#38	refine the effectiveness of the Emergency Response Plan (ERP)?		5	5	10							
		0	0-5	0-5	/10							

Intent: While holding a drill as a training exercise is very useful, the main benefit comes from adjusting the future emergency response rather than just checking it.

**D** - If an emergency response drill, such as a general fire/evacuation drill, has been conducted in the last 12 months, award 2 points.

If drills have been conducted to test at least one other scenario, such as injury, confined space rescue or missing worker, award a further 1 point. Note that if the company work from heights and/or over/on water and/or has confined spaces that are entered at least annually, then they must perform all applicable rescue drills to be awarded this point, even if they have performed other scenarios.

If results of drills are reviewed and the ERP amended as necessary award a further 2 points.

Proof of review may include meeting minutes or formal reports to management, workers, JOHSC, etc.

I – Award up to 5 points for positive % responses from interviewed managers, supervisors and workers being aware of the learnings from emergency drills. If no drills have been held, score zero interview points.

#### Audit Note:

A&A completed multiple ERP drills during the audit period including:

- Campbell River missing person drill March 2, 2023. Two corrective actions completed.
- Haida Gwaii Injured worker in the field and office evacuation drill February 10, 2023. One corrective action completed.
- Vancouver office no ERP drills during the six month audit period.

As a result of an ERP's underway with man overboard drills scheduled, a Vancouver office evacuation drill scheduled by the building manager and only six months in the audit period with the OHSP requiring drills be completed over the calendar year two points were awarded.

As a result of the short audit period and the man overboard drills scheduled for the early summer when conditions are more favourable one point was awarded.

The completed drills include a review of what went well/what areas required improvement in each case with a review of the drills at the A&A monthly safety meetings for those who were not participants. The three drills had three corrective action that were shown as completed. The ERP's are not so specific that the fine details of improvement need to be included in ERP's but rather they are real life improvements so that in the event of an emergency staff are aware of what is required. As a result of corrective actions from drills being both communicated and completed two points were awarded.

Interviews with A&A staff (VP Operations, General Manager, two supervisors, 11 field workers and three office workers) revealed that all are aware of emergency response drills, their use in improving response capabilities and that they are reviewed with the staff at the monthly safety meetings. As a result of 100% positive response for emergency response drills and improvements in A&A's response five points were awarded.



A4. Work	er Input to Adjustments				
A4.1	Is the company's safety program structured to involve	0	D	ı	Total
#39	employee/ contractor representatives in the regular		5	5	10
	review of the safety program with recommendations to	0	0-5	0-5	/10
	management?				

Intent: The program needs a mechanism to allow those affected by the program to have input into the evolution of the program. This could range from suggestion boxes (that are used), JOHSC, open emails, annual formal meetings with contractors. This shows a positive culture with worker engagement via feedback and company follow-through/response.

**D** - Award up to 5 points based on the existence of a mechanism to involve workers and/or sub-contractors in the regular review of the safety program.

Positive evidence may include, but is not limited to:

- Terms of reference of a compliant JOHSC or Representative where required by regulation
  - an absent or non-compliant JOHSC or Representative where one is required by regulation is a negative finding
- Meeting minutes from multi-company committees involving sub-contractors (only where such committees exist) showing program review
  - meetings that do not involve program review content are not positive findings
- Emails or other communications
- Safety Manual sections defining program review
- Worker participation in performing inspections and investigations, etc.
- **I -** Award up to 5 points based on the % of interviewed managers, supervisors and workers reporting how workers or contractors can effectively make changes to the company system if necessary.

#### Audit Note:

A&A's JOH&S committee is required as they have grown and have a current staff of 39 people down from a high of 47 in past audits with only the Vancouver office having > 20 people however many are not in the office on a regular basis. A&A continues the JOH&S committee as a best management practice as it has increased buy in and staff ownership of the OHSP becoming an effective forum for implementation and maintenance of the program producing rolling minutes with a CAL and a terms of reference/membership list/annual review. The advantage is that the committee includes management and workers with representation from the Vancouver and Campbell River offices allowing for clear communication from the floor to management. The other forum is the monthly safety meeting that all staff attend noting the change back to one meeting with other offices joining by video link. The forum allows for requests from staff as well as delegation of duties all in an effort to improve the OH&S program. The office inspections show that different staff are involved in the inspections as do contractor safety inspections which are completed by different but designated staff members (i.e. the project manager/forester). A&A's safety meetings do not include their contractors with the exception of pre-work or tailgate meetings. The committee maintains at Terms of Reference, meeting minutes were available for each month of the audit period (September 2022 through March 2023) as well as the JOH&S rolling action tracking worksheet (current to March 31, 2023). The JOH&S committee completed an annual assessment as required by sec. 3.26(2) of the OH&S regulation dated January 28, 2023. As a result of documentation that shows worker participation in implementation and improvement of the OH&S program as well as an annual evaluation of the JOH&S committee, six of six committee requirements (i.e. 6/6=100%) are complete and therefore five points were awarded.

Interviews with A&A staff (two managers, two supervisors and 14 workers) revealed that all are aware of the open culture and their ability to raise concerns/have them addressed at the monthly safety meetings. As a result of 100% positive response for emergency response drills and improvements in A&A's response five points were awarded.



A5. Per	A5. Performance Management										
A5.1	Are individual responsibilities and accountabilities supported	0	D	I	Total						
#40	by regular review and recognition of performance towards		3	7	10						
	safety goals, targets, and expectations?	0	0,3	0-7	/10						

Intent: Leadership should be demonstrating and reinforcing individual accountability for safety performance, goals and expectations. This should be a two-way communication process in a one-on-one setting and is formal, documented, structured and scheduled.

**D** - If the company has a mechanism for formally reviewing personal safety performance, award 3 points. There may be different programs for different levels or work units in the company, especially where different unions have involvement. There is no requirement that the programs be uniform across the organization. This topic deals with the results of assessments, rather than the performance of assessments. Disciplinary processes for enforcing the use of engineering, administrative and PPE controls must be included.

NOTE: This question specifically prohibits records of completed discipline or reward from being examined. Only policy documents or blank forms are in scope.

**I -** Award up to 7 points based on % of interviewed managers and supervisors being able to describe a functioning system.

#### Audit Note:

A&A formalized their annual performance review process with safety expectations integrated into the questions (#4 & #5) on the annual performance review template. In addition, the company requires each staff member to review the OH&S program/JSB with annual review and sign off which includes the use of controls and implementation of the discipline policy if/when required. This review is consistent with the Employment Letter which requires staff members to follow A&A's OH&S program as a condition of employment. The performance review process is a one on one process with formal sign off by A&A and the employee. As a result three points were awarded.

Interviews with the VP Operations and the General Managers and two supervisors were positive with respect to the formalized performance review process. As a result of four of four (i.e.100%) positive responses describing a functional performance review system seven points were awarded.

A. Adjusting for Better Work –Scoring Summary											
Awarded Available N/A Available – N/A % awarded											
Total	60	60	0	60	100						



# **Key Definitions**

Term	Definition
Company	The organization being audited.
	The company may have clients, licensees and/or Prime Contractors above
	them in the responsibility structure. To those organizations, the company
	would be a contractor (or subcontractor).
	The company may have contractors and sub-contractors below them in the
	responsibility structure. To those organizations, the company would be a
	client, Prime and/or licensee.
	The audit report is to be about the company being audited and the areas
	that they have control over. The actions of a company under the audited
	company in the contractor chain only impact the audit report in how the
	audited company should be managing the activities, and not deal with issues
	that are internal to the contractor (i.e. failure of the subcontractor to maintain
	equipment is not a deficiency in the maintenance program of the company,
	but may be a weakness in contractor selection or oversight). Similarly, if the
	deficiencies that impact the company are caused by a company above them
	in the responsibility pyramid, they only impact the company audit is so far as
	the company has control over the issue (i.e. reporting needed road
	maintenance to the Prime is the maximum expectation if the company being
	audited has no road maintenance responsibility.)
Contractor	A company or a person other than an employee, that the company pays
	(including indirectly via a contractor chain) AND
	is present on the company-controlled worksite.
	Contractor, for the purposes of the audit, is a relative term that applies to an
	organizational level UNDER the company being audited. It is not an absolute
	term, since most companies are also contractors to the company above
	them in the responsibility pyramid.
	Examples: a water taxi would not typically be a contractor since they are not
	on the company site.  A camp cook could be a contractor if the company operations include control
	of the camp, but would not be a contractor if the cook (or the company that
	the cook is employed by) has control over the camp.
	A fuel delivery service would typically be a contractor if they are allowed
	unescorted on the company forestry site during off-hours.
	External auditors are contractors.
	באנפווומו מעטונטוס מופ טטוונומטנטוס.



Term	Definition
100	A company with no more than one field worker other than IOO-exempt
	personnel, AND
	no contractors other than IOO-exempt personnel AND
	with no more than one office support person who does NOT supervise,
100 5	direct or dispatch the field worker.
IOO-Exempt Personnel	One person of safety watch for an unlimited number of days per year per IOO.
Personner	An additional field employee for no more than 10 person-days per calendar
	year per IOO for vacation, relief or additional special project labour.
Multi parcan	
Multi-person IOO	A company with no more than 3 field workers other than IOO-exempt personnel AND
	no contractors other than IOO-exempt personnel AND
	with no more than one office support person who does NOT supervise,
	direct or dispatch any field workers AND
	the up to 3 field workers are all self-contained and do not rely on each other
	for daily support.
	A multi-person IOO may not exceed 4 field workers other than safety watch,
	including temporary workers, at any point in the year.
	While a multi-person IOO can be awarded SAFE-certification, it is on a per-
	person basis rather than per-company and is therefore not COR-eligible.
Visitor	A person or company who is not paid by the company AND
	is present on the company-controlled worksite.
Documentation	The company submits the required policy, procedure, standard or other
only for	guidance document for the applicable topic using a condensed tool.
Endorsement	
Young Worker	Any worker, including a supervisor, under 25 years of age, regardless of
	their experience. For example a 23 year old worker with 6 years in the
	company is a young worker and still requires enhanced supervision until
N. 147 I	they are 25.
New Worker	means any worker who is
	a) new to the workplace,
	b) returning to a workplace where the hazards in that workplace have
	changed during the worker's absence, c) affected by a change in the hazards of a workplace, or
	d) relocated to a new workplace if the hazards in that workplace are
	different from the hazards in the worker's previous workplace;
	american mem and mazardo in the worker o provided workplace,



# **Company Profile**

Complete all fields – an incomplete NOAA cannot be processed

	npany's a					This form is a Pre-Audit NOAA							
Apri	l 6, 2023						This form is a Post-Audit NOAA ☑						
	A. Type of Audit – check all that apply (double-clic						each box to	activa	te)				
□ Certification □ Student □						Ve	rification	tive					
Ø	☐ Maintenance ☐ Gap Analysis ☐					A.N	Л.А.Р. yr 1		Limited Sc	ope			
	Recertif	ication		Team list members in sec I.		A.N	Л.А.Р. yr 2		Phased – I	oart		of	
	Combin use Joint N	ed - Must IOAA		MAGSAFE 1		W.	I.V.A.		SAFE Only	/ – no C	OR	2	
	Other:		Ø	BASE Version 4		Inte	ernal	V	External				
	B. Com	oany Info	rmat	ion	1	ı							
Leg	al Compa	iny Name	):				Company Trade Name/dba:						
A&A	Trading L	.td.					-						
Woı	kSafeBC	Account					SAFE Certification #:						
5560	622						9130004						
Mai	ling Addre	ess:					City: Province: Posta					de:	
1210	D-1111 Me	lville St.					Vancouver		ВС	V6E3V6			
Stre	et Addre	ss: (if diffe	erent	from mailing addres	s)		City:		Street	City:			
-							-		-	-			
Con	npany Co	ntact:					Position:						
Leig	Leigh Mercer						Operations	Fores	ter/Safety C	Coordina	ator		
Pho	Phone:						Email:						
250	.202.739	6					lstalker@aatrading.com						
	C. Audit Period												

Complete estimated for pre-audit. Complete both for post-audit.	Start Date	Date of last data collection	Report Submission Date		
Estimated	April 4, 2023	April 7, 2023	April 21, 2023		
Actual	April 3, 2023	April 6, 2023	April 10, 2023		



D. High Risk Company Activity Types

Chec	k all that apply		
$\overline{\mathbf{A}}$	Hiring Contractors	$\overline{\checkmark}$	Creating a multi-employer workplace
	Lockout	V	Camps and Remote Accommodations
	Manual Tree Falling		Working near High Voltage Power Lines
	Commercial Vehicles		High Hazard Materials
	Heavy Equipment Operations		Working at Heights
	Respiratory Protection		Combustible Dust
	Hot Work		Confined Space
$\square$	Having Young Workers (under age 25)	$\overline{\mathbf{A}}$	Working over or on Water

## **E. Personnel Count**

Total perso	Total personnel count per month for last 12 months:													
(Total = ow	(Total = owners + management + supervisors + workers + workers of <u>dependent</u> contractors)													
1 2 3 4 5 6 7 8 9 10 11 12														
Year (yyyy)	2022	2022	2022	2022	2023	2023	2023	2023	2023	2023	2023	2023		
Month (mmm)	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug		
Count 42 42 42 40 40 39 39 41 <sup>1</sup> 41 41 41										41				
☐ Attach an Organizational Chart or other description of the structure of the comp							pany.							

## F. Lead Auditor Information

			Auditor Number (or 'Student'): E0608-001				
Lead auditor email:forest.solutions@shaw.ca			Lead auditor cell:250-550-7445				
Team -			-				
Team -			-				
Accompanie							
Name:	Leigh Stalker						
Occupation:	Operations Forester/Safety Coordinator						

<sup>&</sup>lt;sup>1</sup> Estimate given two summer students expected to start in May 2023





## G. Scope of audit

List all WorkSafeBC CUs, their fixed locations, and operating sites. Indicate if work activity is intended (pre-) and actually present in the audit. If the company contact is unsure of their CUs or locations, please contact the BC Forest Safety Registrar.

Insert additional rows above the total line if necessary

Total interviews performed are automatically calculated with <CTRL-A><f9> (or when opening or printing)

СU	WSBC fixed location name or address	SITE Audit site name (if more than one at each		Site	s sele	cted fo	r visit			er of wed au	for (			Schedu	uling for cu	rrent audit
	(list separately for each CU)	site per location)	site	This year	1 yr ago	2 yrs ago	3 yrs ago			NOAA :-NOA				Auditor	Start Date	End Date
703008	Vancouver office	Head Office	16-20	V	$\overline{\mathbf{A}}$	V	V	М	1	S	1	W	7	PLC	Apr 3	Apr 4
703008	Campbell River office	Branch Office	6-20	V	$\overline{\mathbf{A}}$	V	V	М	1	S	1	W	6	PLC	Apr 5	Apr 6
703008	Sandspit Office (via Teams)	Branch Office	1-2	V	$\overline{\mathbf{A}}$	V	V	М	-	S	-	W	1	PLC	Apr 6	Apr 6
								М		S		W				
								М		S		W				
								М		S		W				
								М		S		W				
								М		S		W				
								М		S		W				
								М		S		W				
								М		S		W				
Maximum count from table E on previous page:		42	in	Total terviev	vs	18	М	2	S	2	W	14				
Minimum interviews required for count on line above based on table J on following pages:		17	% of total interviews that are worker interviews: 78 Min 80% worker interviews			iterview targe	et									

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Comments, notes, descriptions regarding sampling plan (pre- or post-): (Attach additional pages for proposals for and/or outcomes of special time frames, unique sampling protocols, etc. This space can be used on the post-audit form for justifying why a particular plan was not met.

Three staff members have left the company/retired with one on maternity leave lowering the current count. Audit was six months after the 2022 audit in order to regain the pre C19 schedule for company audits (EMS/SFM/CoC & Safety) in the spring of each year. Audit changed to Monday April 3-Thursday April 6 given A&A took Friday April 7 as a statutory holiday.

Describe the overall scope (nature and type) of the company's activities. Include reference to the company's locations as they relate their WorkSafeBC Classification Unit(s) making mention of locations and sites included in this audit:

Forestry layout/silviculture operations, contracted harvest operations, harvest supervision, log purchase/sale.

Locations visited (post audit only):

Vancouver and Campbell River offices. Haida Gwaii/TFL #58 (Sandspit/South Bay/Deena River) and the Sunshine Coast (FL A19229 Skaiakos Point) sampled in mid March 2023 during the EMS/SFM/CoC internal audit with safety observations of of six staff workers, one staff supervisor and four contractors (travel/PPE use/JSB conformity/contractor & prime contractor management) used in the BASE audit.

Equipment observed (post-audit only):

Office equipment, pickup trucks, commercial fixed wing plane and water taxi and contractor logging equipment (EMS/SFM/CoC audit).

Occupations observed (post-audit only):

Foresters (RPF's), Forest Technicians (RFT's), Accountants (CPA's).

Observed company activities on day(s) of audit (post-audit only):

Office activities and field activities (EMS/SFM/CoC audit)

Interview sampling description and count (i.e. 2 owners, 1 mechanic, 3 buncher operators, 6 truckers, etc.) (post-audit only):

No new hires or young workers since the September 2022 audit. Cross section of staff available sampled including JOH&S committee members.



## H. Minimum Interview Table

The minimum number of interviews required for an audit is based on the annual monthly peak value for staff count in the 12 months before the audit. The staff count is equal to the total number of personnel in the company, including owners, management, supervisors, field personnel, office personnel, shop personnel and the total staff of dependent contractors. This applies whether they are permanent or temporary and counts each unique person rather than as full time equivalents. Two people each working half time count as 2 (not 1) staff.

Total Staff	Minimum Interviews	Total Staff	Minimum Interviews	Total Staff	Minimum Interviews
<5	all	234-240	35	560	66
5	4	241-249	36	561-570	67
6-7	5	250-299	37	571-580	68
8	6	300-302	38	581-595	69
9	7	303-309	39	596-605	70
10-11	8	310-312	40	606-615	71
12-14	9	313-315	41	616-625	72
15-16	10	316-320	42	626-638	73
16-17	11	321-325	43	639-645	74
18-20	12	326-329	44	646-655	75
21-24	13	330-332	45	656-665	76
25-27	14	333-335	46	666-678	77
28-30	15	336-338	47	679-689	78
31-36	16	339-341	48	690-699	79
<mark>37-44</mark>	<mark>17</mark>	342-348	49	700-705	80
45-49	18	349-354	50	706-719	81
50-64	19	355-359	51	720-729	82
65-74	20	360-364	52	730-740	83
75-88	21	365-369	53	741-749	84
89-99	22	370-374	54	750-790	85
100-120	23	375-379	55	791-840	86
121-149	24	380-389	56	841-959	87
150-199	25	390-399	57	960-1000	88
200-204	26	400-475	58	1001-1499	89
205-209	27	476-499	59	1500-1800	90
210-212	28	500-509	60	1801-2500	91
213-214	29	510-519	61	2501-4000	92
215-220	30	520-529	62	4001-4999	93
221-222	31	530-539	63	5000-9999	94
223-226	32	540-549	64	10000-24999	95
227-230	33	550-559	65	25000+	96
231-233	34				



# I. Post Audit Signatures

Complete and submit with your post-audit NOAA. Leave blank for pre-audit NOAA

	Management Representat	ive (for internal and external audit	ts)			
$\overline{\mathbf{A}}$	I hereby acknowledge that I have provided true and accurate information to the auditor to the best of my abilities and agree that the audit sampling was completed as stated above.					
Name		Signature (optional)	Date			
Leigh	Stalker	LS	April 6, 2023			
	External Auditor					
V	Safety Council Auditor Code of E I have not violated the Auditor Co consulting activities from this com In addition, I have not been in a p Auditor Manual or the current CC	ode of Ethics during this audit, and have not repany in the 36 months preceding the audit. position which could be perceived as a conflict.	received any economic benefit from OH&S			
Name		Signature (manual or electronic)	Date			
P.L. Ca	arruthers	PLC	April 6, 2023			
	Internal Auditor	,				
	I affirm that					
		uditor Code of Ethics during this audit;				
	-	be objective in conducting this audit				
		ent BASE Auditor Manual.				
	I am a permanent emplo		T =			
Name		Signature (manual or electronic)	Date			
	Submission					



# **Auditor Conclusion**

As the auditor, I confirm that this audit report contains material supporting the inclusion of the							
following Classification Unit(s) as listed below.							
Classification Unit (CU)	CU Description						
703008	Integrated Forest Management						
	integrated i cross marragement						
Notes for Registrar:							
As the auditor, I confirm that this audit report does <b>NOT</b> contain material supporting the inclusion							
of the following Classificat	ion Unit(s) as listed below.						
Classification Unit (CU)	CU Description						
Notes for Registrar:	Notes for Registrar:						

# **Reviewer Conclusion**

# This section is completed during the audit QA process by the reviewer

· ·	udit meets the intent and requirementality assurance process required by		•		
Reviewer name:	Mike Sexton				
Classification Unit (CU)	CU Description	This audit contains materia supporting the CU(s)			
703008	Integrated Forest Management	☑ Yes	□ No		
		☐ Yes	□ No		
		☐ Yes	□ No		
		☐ Yes	□ No		
Reviewer notes:					



# **Outcome**

# This section is completed during the audit QA process by the reviewer

Based on the contents of this audit report, the following result and score is awarded by the BC Forest Safety Council:

Component	Results	Score
SAFE Companies	SAFE Certification	100%

Component	Scope of Operations Certified	Other conditions
Limitations	Company Assigns Prime Contractor Status	

# This section is completed during the audit QA process by the COR Administrator

Component	Company Intent	Certification Outcome		
COR Eligibility - OHS	Intended for COR	Eligible for COR		