

WORKPLACE COVID-19 HAZARD ASSESSMENT POLICY

1. PURPOSE

To establish a cost-effective, workable, scalable, and flexible system to identify, assess and control workplace COVID-19 infection hazards at XYZ Laboratory workplaces in accordance with the requirements of the Occupational Health and Safety Act and associated Regulations, including but not limited to the Emergency Temporary Standard (“ETS”), as well as other applicable orders and guidelines from the government and public health agency (“Guidelines”) requirements and standards.

2. DEFINITIONS

For purposes of this Policy:

“Administrative controls” means the provision, use, and scheduling of work activities and resources in the workplace, including planning, organizing, staffing, and coordinating, for the purpose of controlling COVID-19 risk;

“Competent” means possessing knowledge, experience, and training to perform a specific duty safely and effectively;

“Engineering controls” means the physical arrangement, design, or alteration of workstations, equipment, materials, production facilities, or other aspects of the physical work environment, for the purpose of controlling risk.

3. SCOPE

The intent of this Policy is to identify, assess, and control COVID-19 hazards that endanger the health and safety of not only workers but all persons present at XYZ Laboratory facilities and work sites, including but not limited to clients, customers, contract workers and visitors.

4. RAC SYSTEM

XYZ Laboratory will use a 3-phase system to protect workers, visitors, and others from COVID-19 the hazards of the workplace based on the principles of RAC:

R ecognition, i.e., identifying COVID-19 hazards;

A sssessment, i.e., evaluating the urgency of and prioritizing hazards identified; and

C ontrol, i.e., selecting appropriate measures to eliminate or control identified hazards.

5. PHASE 1. COVID-19 HAZARD RECOGNITION

The objective of the Recognition phase of the RAC system is to identify all COVID-19 hazards and potential hazards in the workplace in accordance with the following principles:

- Hazard identification will be conducted before work begins at a work site;
- Hazard identification will be done by a competent person who is familiar with infection control and the ETS;
- Non-management workers at the work site will participate in hazard identification via the workplace Joint Health and Safety Committee (“JHSC”) or Health and Safety Representative (“Representative”), or if no JHSC or Representative exists, direct participation;

After completion of hazard identification, a written report will be prepared listing an inventory of COVID-19 hazards by job classification.

6. PHASE 2. COVID-19 HAZARD ASSESSMENT

The objective of the Assessment phase is to analyze the COVID-19 hazards identified during the Recognition phase and determine urgency. Using the inventory of hazards created at the end of the Recognition phase, a competent person will assess the identified hazards by completing the COVID-19 Hazard Assessment Form (a copy of which is attached to this Policy as Attachment A) rating each job classification by level of exposure as:

- Very high;
- High;
- Medium; or
- Lower.

Such assessments will be based on COVID-19 risk factors, including:

- Physical distance of workers from co-workers, customers and other persons at the site between and/or employees and customers;
- Effectiveness of current ventilating, air circulation and HVAC systems;
- Operations requiring close contact, e.g., sharing of vehicles;
- Age, respiratory or immune disorders, or other chronic medical conditions or physical characteristics making persons at the site unusually susceptible to COVID-19 infection; and
- Availability of respirator masks and other necessary PPE.

7. PHASE 3. COVID-19 HAZARD CONTROL

XYZ Laboratory will ensure all reasonably practicable steps are taken to control COVID-19 hazards identified in Phase 1 on the basis of the assessment performed in Phase 2 in accordance with the following principles:

If reasonably practicable, XYZ Laboratory will eliminate COVID-19 hazards. Where total elimination is not reasonably practicable:

- Reasonably practicable engineering controls will be used to control the hazard;
- Administrative controls will be used where engineering controls are not reasonably practicable or as a supplement to engineering controls to minimize the COVID-19 hazard;
- Gloves, masks, aprons and other personal protective equipment will be used as a last resort or as a supplement to engineering and administrative controls.

8. REVIEW & EVALUATION

The following monitoring and review measures will be taken for as long as the COVID-19 pandemic lasts or until such time that COVID-19 infection no longer poses a significant risk:

8.1 Review of Hazard Identification & Assessment

COVID-19 hazard identification and assessment required by Phases 1 and 2 will be repeated:

- At reasonable intervals to prevent the development of unsafe and unhealthy work conditions;
- When a new work process is introduced;
- When a work process or operation changes;
- Before construction of significant additions or alterations to the work site; and/or
- In response to changes to Guidelines.

8.2 Review of Safety Controls

The effectiveness of COVID-19 hazard controls will be reviewed:

- As part of monthly workplace inspections carried out;
- In response to circumstances suggesting that conditions have changed and that controls might no longer be effective, including but not limited to:
 - o The occurrence of injuries, illnesses, incidents, accidents, or near-misses;
 - o Complaints or concerns expressed by workers at the site, either directly or through their JHSC or Representative;
 - o After significant changes to the affected job or process's location, procedures, required equipment, etc.; and
 - o In response to changes to the Guidelines, ETS or other regulatory requirements.