

Exposure Control Plan for COVID-19 (Coronavirus)

(Information gathered from Government of Canada and NL, NLCSA, ACA, CANS)

Company information

InnovativeNL Group

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Health hazards of COVID-19

COVID-19 has been declared a global pandemic and a public health emergency in Newfoundland and Labrador. It is a virus that can cause respiratory illness and can lead to hospitalization and death. The effects of COVID-19 are expected to be much more severe than for seasonal influenza because most people will not have any immunity to the virus and no licensed vaccination currently exists. Seniors and people with underlying health issues (including heart disease, diabetes, lung disease and high blood pressure) are at a higher risk of hospitalization and death, but young and healthy people are also at risk.

Symptoms

Symptoms of COVID-19 are likely to include fever, dry cough, sneezing, sore throat and in some cases, difficulty breathing.

Transmission

Exposure to COVID-19 can occur by:

- Breathing in droplets in the air that are generated when people cough or sneeze
- Close contact with other people (e.g. shaking hands or hugging)
- Touching surfaces that have been contaminated with the virus and then touching the face, mouth, or food.

Note that touching a contaminated surface and then touching another surface may cause the virus to transfer from one surface to another

COVID-19 can be transmitted even by people who are not displaying symptoms of the disease. People who may have been exposed with COVID-19 should not come to work until they have completed the mandatory 14-day self-isolation, required by the federal and provincial governments. This includes people who:

- Have symptoms of COVID-19

- Have arrived to Newfoundland and Labrador from Hubei Province in China, Iran or Italy prior to March 14th 2020.
- Have arrived in Newfoundland and Labrador from outside of Canada on or after March 14, 2020
- Have arrived in Newfoundland and Labrador, from another Canadian Province on or after March 20, 2020
- Have been exposed to someone with COVID-19
- Share a home with someone who has symptoms of COVID-19
- Share a home with someone who has been exposed to COVID-19

Statement of purpose

Our company **InnovativeNL Group** is committed to providing a safe and healthy workplace for all of our staff. We will utilize all measures practicable to minimize worker exposure to COVID-19. Our work procedures will aim to protect not only our workers, but also other individuals who enter our facilities. All staff/supervisors are responsible for ensuring that this plan is implemented and enforced on site and all employees must follow the procedures outlined in this plan to prevent or reduce exposure to COVID-19.

Responsibilities

Employer responsibilities

Our company will:

- Ensure that the appropriate materials (i.e. gloves, alcohol-based hand rubs, and washing facilities) and other resources, (i.e. worker training materials) required to implement and maintain the plan are readily available where and when they are required.
- Ensure that workers are able to maintain social distancing (at least 2 meters) at all times while completing their work safely.
- Select, implement, and document the appropriate site-specific control measures.
- Ensure that supervisors and workers are educated and trained on the risk associated with COVID-19, the controls necessary for their protection and the overall requirements of this plan.
- Maintain records of training and inspections.
- Update the plan and implement control measures as new information becomes available, from the Government of Canada & the Government of Newfoundland and Labrador.
- Conduct a regular review of the plan's effectiveness. This includes a review of the available control strategies to ensure that these are selected and used when practical.
- Ensure that a copy of the exposure control plan is available to workers.
- Maintain a daily list of all workers on each site.

Supervisor responsibilities

Our Consultants will:

- Ensure that workers are adequately instructed on the controls for the hazards at the location.
- Ensure that workers use appropriate personal protective equipment (PPE) where required, (i.e. gloves, eye protection, respirators and full body protection).
- Ensure that workers use proper respirators, they have been fit tested, and the results are recorded as per the organizations Respiratory Protection Program.
- Ensure that social distancing is maintained.
- Direct work in a manner that eliminates or minimizes the risk to workers.

Worker responsibilities

Our workers will:

- Maintain social distance
- Know the hazards of workplace.
- Follow established work procedures as directed by the employer or supervisor.
- Use any required PPE as instructed.
- Report any unsafe conditions or acts to the supervisor.
- Know how and when to report exposure incidents.

Risk identification and assessment

The primary routes of transmission, anticipated for COVID-19, which need to be controlled, include direct contact and respiratory droplets.

Breathing in droplets in the air

The World Health Organization advises that COVID-19 can spread from person to person through small droplets from the nose or mouth which are spread when a person with COVID-19 coughs or exhales. People can catch COVID-19 if they breathe in droplets from a person with COVID-19 who coughs out or exhales droplets. Social distancing (maintaining 2 meters of distance from other people at all times) will help reduce the risk of this occurring.

Close contact

Close contact refers to physical contact with another person, for example shaking hands or hugging. When people cough or sneeze droplets may deposit on their skin or clothing, especially if they cough or sneeze into their hands. People who are carriers of COVID-19 may transfer the virus from their hands or clothing to others during close contact.

Surface contact

Respiratory droplets expelled when a person with COVID-19 coughs, sneezes or exhales, can also land on objects and surfaces around the person. Other people then catch COVID-19 by touching these objects or surfaces, then touching their eyes, nose or mouth. Surface contact involves a worker touching a contaminated object such as a table, doorknob, telephone, or computer keyboard or tool, and then touching the eyes, nose, or mouth. Surface contact is important to consider because COVID-19 can persist for several days on surfaces.

Risk assessment for COVID-19

Prior to commencing work, regular assessments must be conducted to identify hazards to which workers may be exposed and the necessary control measures. **InnovativeNL Group** will ensure that our organization's daily hazard assessments, include the risks relating to the spread and/or transmission of COVID-19. The results of these risk assessments will be communicated to all workers and visitors to site.

The following factors will be considered and appropriate control measures implemented in accordance with the level of risk:

Risk Factors:

- The location in which work is being carried out. Some worksites may see workers exposed to the general public where other sites would have limited numbers of workers and limited contact with other individuals.
 - High risk areas (i.e. work being carried out in hospitals, airports or other high traffic locations).
 - Service/maintenance workers who visit multiple worksites per day.
- Site Access (i.e.)
 - Workers
 - Contractors
 - Suppliers
 - Vendors
 - Visitors
- Common Work Areas (i.e.)
 - Lunchrooms
 - Site trailer/office
 - Work vehicles
 - Tool Crib
- Task requiring work in close proximity (i.e.)
 - Confined space work

- Work in aerial lifts
- Group Activities
 - Orientations
 - Training
 - Toolbox Talks
 - Meetings
- Shared Materials/Equipment (i.e.)
 - Tools
 - Heavy Equipment

Risk control

InnovativeNL Group will use a combination controls including elimination of high risk activities, administrative controls (i.e., social distancing, hand washing, surface cleaning and cough/sneeze etiquette) and PPE (gloves, glasses respirators etc.) to manage the risk of contracting COVID-19 on site.

HEALTH MONITORING

Prior to daily site access, all workers, contractors, suppliers or visitors will be required to confirm that they do not currently meet any of the self-isolation criteria established by the Government of Newfoundland and Labrador.

Guideline for hosting visitors from an international location to our projects or offices.

Clearly communicate to all expected visitors that they are not allowed to visit a worksite or office until they have been back in the country for 14 days from their return and are symptom free. Visitors should also be limited to only those essential for project continuity.

Guideline for employees exhibiting symptoms of respiratory illness.

All individuals are required to disclose if they are experiencing symptoms consistent with COVID-19.

If someone is exhibiting symptoms, we should recommend they leave the worksite and advise them to self-isolate and call health link for further advice. If they are exhibiting respiratory distress requiring emergency care, they should go to the hospital.

If the individual has been outside the country in the last 14 days or exposed to someone

who has recently tested positive for COVID-19, then they MUST leave the worksite.

Guideline for employees who cohabitate or have had close contact with someone who has tested positive.

All individuals are required to disclose if they have been exposed to persons who have tested positive for COVID-19. These individuals will be required to self-isolate for 14 days from last exposure. These individuals should contact Health Link and follow health authority recommendations.

Guideline for employees who have tested Positive for COVID-19.

All individuals are required to disclose that they have tested positive for the virus. They are to notify, by email and phone, the site supervisor and HR.

Your organization will notify all workers on that site of a positive test and a temporary stop work order will be issued, until a further site assessment can be carried out and an effective control plan implemented.

All workers will be asked to self-quarantine and follow local exposure protocols as dictated by the governing health authority in their region. In Alberta currently, individuals who test positive are not permitted to return to a jobsite or office until they have two confirmed negative COVID-19 tests and have their isolation orders lifted by a medical professional.

Your employer will work with our leaders and clients to determine next steps when work will resume.

Steps if a Case is Suspected:

- If it is suspected that someone is sick in the Workplace: Ensure protection of workplace and provide good solutions for workers.
- “Sick” means coughing or sneezing more than explainable from dust or environmental issues. It could be the common cold or the flu, either way if there is a possibility that someone is sick, they should be sent home.
- If a trade partner is suspected as sick, send them home and notify their manager.
- If an employee who can work from home effectively is identified as sick they will be sent home and use technology to continue to work.
- If an employee who cannot work from home effectively is identified as sick they will be temporarily laid off so they can recover.
- Anyone who goes home as sick or is sent home as sick must follow current guidelines in respect of screening, testing or self-isolation

- Workers who suspect they may have COVID-19 should use the NL Self Assessment Tool: <https://www.811healthline.ca/covid-19-self-assessment/> or call 811 for assistance.
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What to do with a confirmed COVID-19 case:

The projections show that 30-70% of the population may ultimately get this illness. All the measures being implemented are to slow the spread to ensure the medical system has the capacity to treat those who need it when they get it.

In the event of a confirmed case –

- Notify everyone by email as soon as it is confirmed. It is important to communicate well through this so you will be the first to know.
- Follow the guidelines provided by NL Health Services
- Research is showing the virus lasts max 72 hours without people so we would shut down the workplace for 72 hours. After we would go in and disinfect the hard surfaces like door handles to be sure, but it would be safe to continue work there.
- If we have a crew or entire worksite that is quarantined, we will quarantine them for 14 days, shut down the site for 72 hours and restart it as above with a substitute crew to keep work proceeding.

If workers are positive for COVID-19

If workers are ill with COVID-19, they must advise their supervisor that they are ill and stay at home. Workers should only return to the workplace once they have recovered from COVID-19.

GENERAL PRINCIPLES.

Your Health and Protecting Others.

Active participation is critical as this is a work in progress which is new territory for us all. It will be a team effort across industry so do please share any ideas or suggestions that can make it safer and contact your supervisor or HSE Manager promptly. If you have questions or concerns, please direct them to your supervisor. The goal is to provide a safe workplace, if any person has a safety concern then sharing these is extremely important.

Adherence to safety procedures is necessary as safety and health is our principle concern.

Contractors and workers who do not comply with these procedures may be asked to leave the site and not permitted to return until the current situation is less acute. At the end of the day risky behavior on the part of one puts all of us in jeopardy.

Prevention procedures should be based on health monitoring, social distancing, hand hygiene, cleaning and disinfecting as well as contractor and project specific procedures to prevent the transmission of COVID-19 to workers on a project

Social Distancing

Social distancing is a technique to prevent the spread of COVID-19 by limiting close contact with others. The Public Health Authority recommends keeping a distance of 2 meters (6 ft.) from each other.

All workers shall observe social distancing. Social distancing measures include:

- limiting groups of workers coming together in orientation, lunch and meeting rooms, tool cribs, change rooms, smoking areas, etc.
- preventing workers from congregating at the entrance to the: project, hoist, stair wells, scaffolding, washroom facilities, etc.
- restricting access to occupied work areas like trailer offices, etc.
- controlling traffic patterns – where practicable designate only up and only down stairwells or in / out gates, this avoids the potential for workers to pass each other within the social distancing space.

Contractors are required to:

- communicate and reinforce **self-distancing** practices with their workers
- conduct regular inspections of their worker areas to verify that workers are practicing social distancing, to the best of their ability
- notify us of any concerns they have for social distancing practices or work procedures

Informational signage, warning workers of the importance of **self-distancing** will be installed at locations on the project where there is a potential for workers to congregate. We will conduct regular inspections of the project to verify that workers are observing social distancing.

HAND WASHING

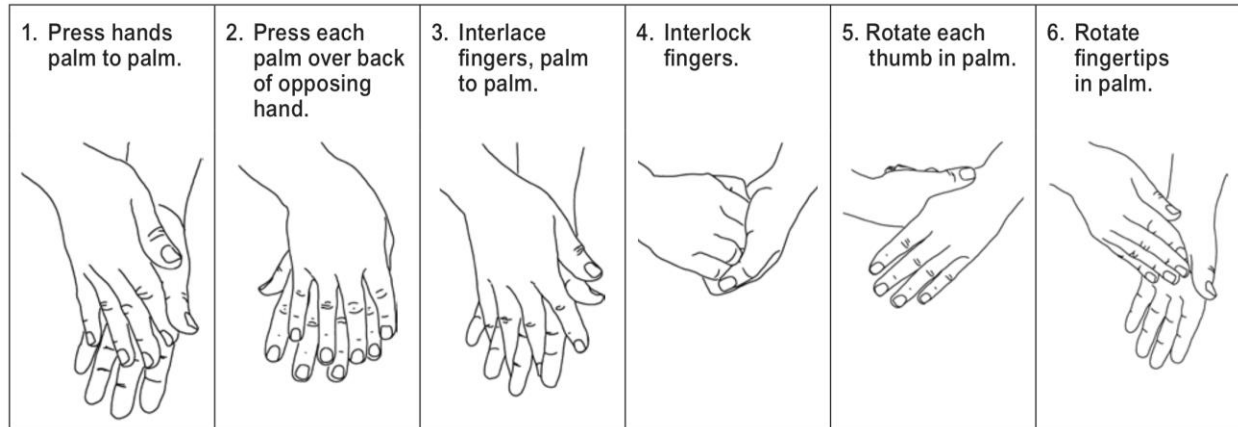
Hand washing is one of the best ways to minimize the risk of infection. Proper hand washing helps prevent the transfer of infectious material from the hands to other parts of the body—particularly the eyes, nose, and mouth—or to other surfaces that are touched.

Wash your hands immediately:

- Before leaving a work area

- After handling materials that may be contaminated
- Before eating, drinking, smoking, visiting the washroom

Hand washing procedure



Use soap and warm running water and wash hands for at least 20 seconds. If warm water is unavailable, use a waterless hand sanitizer that has at least 70% alcohol. Follow the manufacturer's instructions on how to use the cleanser. Alcohol-based hand sanitizing dispensers are located

COUGH/SNEEZE ETIQUETTE

Our workers are expected to follow cough/sneeze etiquette, which is a combination of measures that minimizes the transmission of diseases via droplet or airborne routes. Cough/sneeze etiquette includes the following components:

- Educate workers in control measures, including hand washing.
- Post signs at entry points to instruct everyone about control measures.
- Cover your mouth and nose with a sleeve or tissue when coughing or sneezing.
- Use tissues to contain secretions, and dispose of them in a waste container immediately.
- Turn your head away from others when coughing or sneezing.
- Wash hands regularly.

Enhanced Surface Cleaning and Disinfection

HYGIENE PRACTICES

During the COVID-19 Public Health Emergency, enhanced cleaning and disinfection should be used on worksites to reduce the risk of disease. COVID-19 spreads through the respiratory droplets of an infected person. The virus can survive on different surfaces but can be killed by most cleaners and disinfectants.

CLEANING: Removes visible soiling (e.g., dust, soil). Cleaning removes rather than kills viruses and bacteria. It is done with water, detergents, and steady friction from cleaning cloth.

DISINFECTING: Kills viruses and bacteria. A disinfectant is only applied to objects, never on the human body. All visibly soiled surfaces should be cleaned before disinfection. Clean and disinfect all frequently touched surfaces, at minimum, twice daily. This includes but is not limited to:

- table tops
- control panels
- computer/keyboard/mouse
- door knobs
- light switches
- handles
- bathrooms
- steering wheels
- pens
- hoist gates
- stair railings
- first aid equipment

Cleaning and disinfection should be done as often as possible and at a minimum at the beginning of shift, before eating, between crew changes, end of shift. Avoid sharing items such as tools and pens and, disinfect any items before sharing.

CLEANING & DISINFECTING

During the COVID-19 Public Health Emergency, enhanced cleaning and disinfection has been initiated to reduce the risk of exposure. Coronavirus can survive on different surfaces but can be killed by most cleaners and disinfectants.

- Cleaning and disinfection will be done as often as possible and at a minimum at the beginning of shift, before eating, between crew changes, end of shift.
- All frequently touched surfaces will be cleaned and disinfected, at minimum, twice daily. This includes but is not limited to:
 - lunchroom table tops
 - computer/keyboard/mouse
 - door knobs
 - light switches

Most cleaning can be done using regular housekeeping best practices.

What products should be used for disinfection:

- Household or commercial disinfection products (follow manufacturer's instructions for disinfection), or a bleach solution (1 part bleach and 9 parts water).
- Do not mix bleach with ammonia or any other cleaning product.

During cleaning/disinfection:

- If the surface is dirty remove visible dust and debris and clean using detergent or soap prior to disinfection.
- Follow disinfection product manufacturer's instructions for disinfection.
- Wear nitrile or neoprene gloves while working with disinfectant products.

After cleaning/disinfection:

- Wash hands with soap and water using proper handwashing procedures immediately after gloves are removed.
- All disposable materials must be placed into a leak proof garbage bag and sealed for disposal.

Housekeeping:

- Regular housekeeping practices should be maintained in addition to enhanced surface cleaning/disinfection.
- Use a vacuum, not sweep dusting, wherever possible.

NOTE: in the event a confirmed case of COVID-19 was present on site, a specialized cleaning company should be contacted for professional disinfection.

- handles
- bathrooms
- steering wheels
- stair railings
- Avoid sharing items such as tools and pens, and disinfect any items before sharing.
- Storage of personal gear such as jackets, vests and rain gear are not permitted on-site unless stored in a location where contact with individuals is not possible (an infected individual may have left respiratory droplets on their clothing, which could expose others if they touch the clothing).

PERSONAL PROTECTIVE EQUIPMENT (PPE)

For certain tasks/activities, workers will be required to use PPE to help mitigate their exposure to COVID-19 (i.e. tasks where social distancing cannot be maintained, in high risk work settings etc. Where required, the company will ensure that:

- All PPE is appropriate to the hazard.
- All PPE meets the requirements of the Newfoundland and Labrador Occupational Health and Safety Regulations.
- Workers are trained in the proper use and care of the personal protective equipment.
- Workers are properly fitted for the PPE (i.e. fit testing for respirators).
- Supervisors are enforcing PPE requirements on site.

Worker training

Our workers will receive training in the following:

- The risk of exposure to COVID-19, and the signs and symptoms of the disease
- Safe work procedures to be followed, including hand washing, social distancing and cough/sneeze etiquette
- Location of washing facilities, including dispensing stations for alcohol-based hand sanitizers
- Safe selection, use and care of respiratory protection and fit testing (where respiratory protection is required)
- How to report an exposure to or symptoms of COVID-19.

Contractual Considerations

TBD

Supply Chain Audit

It is prudent that our project teams immediately complete a supply chain audit to identify, determine the impact and identify mitigation strategies for supply chain interruption including but not limited to the following:

- Possible shortages of raw materials
- Possible shortages of finished products
- Cost escalation of products or materials
- Any vulnerabilities to the supply chain
- Changes to delivery services or procedures

We will be providing support and sharing information as it becomes available to assist you in managing this potential disruption. It is important to recognize that these disruptions may not be seen or recognized for weeks or months. Timely notification of potential disruptions are typically defined in our Contracts so please become acutely familiar with notification periods as soon as possible.

Record keeping

Our company will keep records of instruction and training provided to workers regarding COVID-19, as well as exposure reports and first aid records.

The company will also keep a detailed log of persons entering the site (workers, contractors, suppliers, vendors, visitors etc.), including their name, date of visit, time of visit and contact information, in the event contact tracing is required because of a potential exposure.

Review

- We will update the plan and implement control measures as new information becomes available from the Government of Canada & the Government of Newfoundland and Labrador. At minimum, the plan will be reviewed in consultation with our Occupational Health and Safety Committee or Worker Health and Safety Representative.

APENDIX A

COVID-19 Health Check Questionnaire

The following questions are designed to ensure our Site Supervisors and Trade Partners are able to make informed and collaborative decisions that maintain the highest possible level of health and wellbeing on our projects. All workers must complete of this form.

Name:	Project Name:
Employer:	Date:

Please complete the following questions honestly and accurately by selecting “YES” or “NO”.

QUESTIONS	Please Check	
	YES	NO
1. Have you travelled outside of the Province on or after March 23, 2020 or been in close contact with someone who has?		
2. Have you travelled to Asia, United States or Europe in February or March 2020 or been in close contact with someone who has?		
3. Are you experiencing the signs/symptoms of COVID-19?		
4. i.e. shortness of breath, cough, sore throat, or fever?		
5. Have you been in contact with a person showing the symptoms of COVID-19 within the past 14 days?		
6. Have you been in contact with a person who has tested positive for COVID-19 within the past 14 days?		

If you answer “YES” to any of the questions above, you may be asked to leave the worksite and liaise with your Employer on next steps.

Your Employer will advise you on what must happen next and may include return to work or the recommendation to self-isolate and take the online COVID-19 self-assessment tool.

Workers who are determined not to present a risk of COVID-19 transmission to others on site will be allowed to return to work as per the relevant Policy.

***NOTE: This Health Check Questionnaire is mandatory for all workers.**

Workers who refuse to complete this Health Check Questionnaire as defined by the Site-Specific Pandemic Preparedness Plan will be denied access to the site.

I hereby acknowledge the above information to be true.

Employee Signature: