

Contractor: _____

Harvesting System: _____

Operating Area: _____

Forest Management District: _____

Inspector 1 _____

Inspector 2 _____

Inspection Period: _____

Date: _____

[illegible]

		Job Site Directive book completed & left on jobsite (Y / N)	_____
		Environmental Incident Report Required (Y / N)	_____
Total Number of Points Achieved			_____
Total Number of Points Achievable			_____
Inspection Score (Achieved / Available) X 100)			_____
Minimum Acceptable Score	90 %	Pass(P) or Fail(F)	_____
		Sign - Contractor/Supervisor	_____
		Sign - Inspector 1	_____
		Sign - Inspector 2	_____
		Sign - Supt Responsible for Contractor	_____

EMS Compliance (No. 2) Inspection

Inspection Key

	Documentation Evidence
	Employee Questions

Contractor:

Harvesting System:

Operating Area:

Forest Management District:

Inspector 1

Inspector 2

Inspection Period:

Date:



Significant Environmental Aspects (SEAs)

- Release to water and land
- Natural resources management
- GHG emissions & climate change
- Fire

SEAs	No.	Inspection Item	Observations	Value	Achieved			
	1-0-0	Documentation on site:		Possible 40				
	1-0-1	Forest / Environmental Policy posted on job site		2	*			
4	1-0-2	Provincial Fire Season Operating Permit (N/A to Ballast only)		4				
	1-0-3	Federal Stream Crossing Authorizations (N/A to Ballast only)		2				
	1-0-4	Provincial Stream Crossing Approvals		2				
	1-0-5	Provincial Protected Water Supply Area Approval		2				
	1-0-6	Emergency Response Plan/Hazardous Products		4				
2	1-0-7	SOP binder on jobsite		2	*			
	1-0-8	Proof of waste oil disposal		4	*			
1	1-0-9	Pre-Work Form posted on Jobsite		2				
	1-0-10	Employees aware of and know location of ER Plans/PWSA/Spec. Consid.		4				
	1-0-11	Monthly check book completed		8				
	1-0-12	Adequate Stream Crossing Notification		4				
		Subtotal						
	2-0-0	Fuel/Oil Storage, Handling, and Disposal:		Possible 60				
	2-0-1	Fuel/Oil > 100m from waterbodies (or PPWSA permit requirements)		2	#			
1	2-0-2	Fuel storage tanks registered/placarded/in good condition		4				
1	2-0-3	Slip tanks/containers (use/condition, secured, spill kit/fire ext.)		8				
1	2-0-4	Servicing > 30m from waterbodies (or PPWSA permit requirements)		2				
1	2-0-5	No drips/leaks from fuel tanks or hoses		6				
1	2-0-6	Proper refueling procedures followed/TDG certificate		4				
1	2-0-7	No drips/leaks from equip. hydr./fuel hoses;		6				
1	2-0-8	Minor fuel/oil spills and stained soil		8				
1	2-0-9	Spill kits on all equipment; rupture seal on Ballast Truck		4				
1	2-0-10	Containment basin for fuel, gas, and oil storage/used batteries		6				
1	2-0-11	Large spill kit on site		4				
1	2-0-12	Employees know and understand fuel/oil guidelines		4				
1	2-0-13	TDG Equivalency Certificate		2				
		Subtotal						
	3-0-0	Road and Trail Construction:		Possible 48				
	3-0-1	Ditches free of debris or obstructions		4				
1,2,3	3-0-2	No debris in waterbodies/centerline brooks		6				
1,2,3	3-0-3	Equipment activity near waterbodies minimized		6				
1,2,3	3-0-4	Temporary crossings: installed, used, maintained, removed		6				
1,2,3	3-0-5	Culverts free of debris or obstructions		6				
1,3	3-0-6	Right-of-ways narrowed through buffer zones		4				
		Subtotal						
		4-0-0		Possible 58				
1,2,3	4-0-1	Buffer zones & boundaries flagged prior to harvesting		4				
1,2	4-0-2	Buffer zones maintained		6	#			
3	4-0-3	Brush mats properly prepared		2				
1,2,3	4-0-4	Erosion control measures in place on trails		6				
1,2,3	4-0-5	No sediment entering waterbodies as a result of harvesting		6	#			
1,2,3	4-0-6	Extraction trails located in acceptable locations		6				
1,2,3	4-0-7	No unnecessary trails or disturbance created by machines		6				
1,2,3	4-0-8	Equip. did not cross bogs or wetlands w/o approval		4	#			
1,2,3	4-0-9	Trails cut off (or rehabilitated if necessary) Min. of 10 wildlife trees per ha. left on operating areas/FECVs		6				
2	4-0-10	Employees know and understand harvesting guidelines/ISO/SFI		4				
1,2	4-0-11	Gov't approval to deviate from guidelines		6				
	4-0-12			2				
		Subtotal						
	5-0-0	Fibre Utilization:		Possible 34				
2	5-0-1	Tops of harvested trees ≤ 8 cm		4				
2	5-0-2	Stump heights < 15 cm or acceptable for winter conditions		8				
2	5-0-3	No excessive butt junking/ junks ≤ 30cm		4				
2	5-0-4	Merchantable trees/ brows left on cutover/ roadside		6				
2	5-0-5	Merchantable timber cut in block/ leave areas		6				
2	5-0-6	Employees know and understand utilization guidelines		6				
		Subtotal						
	6-0-0	General:		Possible 42				
1,2,3	6-0-1	Hay on site for sediment control		4				
1,2,3	6-0-2	Filter fabric on site for sediment control		2				
1,2,3	6-0-3	Support facilities > 100 m from waterbodies		4	#			
1,2	6-0-4	All garbage removed from site		6				
1,2,3,4	6-0-5	Fire equipment on site and in good working order		6				
	6-0-6	Operations within approved operating areas		6	#			
	6-0-7	Prior directives corrected - last #2 inspection		8				
	6-0-8	Deficiencies corrected - # 3 Inspections		6				
		Subtotal						
		Overall Subtotal						
		Total Possible 282 points						

Corner Brook Pulp and Paper Limited

v - Satisfactory (Full Marks)

O - Needs Improvement (1/2 Marks)

X - Deficiency (0 Marks)

N/A - Not Applicable

Environmental Incident Report Required

* Only required on main operation when operations are split

Inspection Key

	Documentation Evidence
	Employee Questions

Contractor: _____

Inspector 1

Harvesting System:

Inspector 2

Operating Area:

Inspection Period:

Forest Management District:

Date:

Corner Brook Pulp and Paper Limited

	<u>Item No.</u>	<u>Inspection Item</u>	<u>Observations</u>	<u>Point Value</u>	<u>Points Achieved</u>
	7-0-0	Personal Protective Equipment	Possible 20 points		
	7-0-1	Head Protection		2	
	7-0-2	Hearing Protection		2	
	7-0-3	Eye Protection		4	
	7-0-4	Safety Footwear/Grippers		4	
	7-0-5	Hand Protection		4	
	7-0-6	High Visibility Apparel		4	
			Subtotal		
	8-0-0	Support Facility	Possible 28 points		
	8-0-1	Safe Location & Visibility		2	
	8-0-2	Housekeeping		2	
	8-0-3	Safe Heating System		2	
	8-0-4	Steps/Rails/ Ladders		2	
	8-0-5	Oxygen/Acetylene/Propane		2	
	8-0-6	First Aid Kit		2	
	8-0-7	Fire Extinguisher		2	
	8-0-8	Eyewash Station		4	
	8-0-9	Electrical System		2	
	8-0-10	Ventilation		2	
	8-0-11	Carbon Monoxide Detector		2	
	8-0-12	Safety News Posted		2	
	8-0-13	Propane Detector		2	
			Subtotal		
	9-0-0	Contractor Requirements	Possible 50 points		
	9-0-1	Safety Policies and PRIME Poster		2	*
	9-0-2	First Aid Record Book		2	
	9-0-3	General Liability Insur./Operator Lic.		2	*
	9-0-4	Orientation Forms + Workplace		4	*
	9-0-5	First Aid , OHS/Act & Regulations		2	*
	9-0-6	Job Hazard Analysis		2	*
	9-0-7	WHIS/Labels/SDS/Hot Work		2	
	9-0-8	AED/Stretcher/Blankets/Rope/Splints		2	
	9-0-9	Working Alone Checklists		2	
	9-0-10	Truck Ramps		2	
	9-0-11	MV Inspec, Insur, Reg & Checklist		2	
	9-0-12	Fire Extinguisher in Commuting vehicle		2	
	9-0-13	First Aid Kit in commuting vehicle		2	
	9-0-14	Communications in commuting		2	
	9-0-15	Housekeeping in commuting vehicle		2	
	9-0-16	Prior Deficiencies Corrected #2 inspection		6	
	9-0-17	Service Truck Cab & Box		4	
	9-0-18	Employees aware of & know location of safety documents		2	
	9-0-19	Road signs		2	
	9-0-20	Take 5		4	
			Subtotal		

	<u>Item No.</u>	<u>Inspection Item</u>	<u>Observations</u>	<u>Point Value</u>	<u>Points Achieved</u>
	10-0-0	Heavy Equipment	Possible 82 points		
	10-0-1	Brakes		2	
	10-0-2	Guards (FOPS/ROPS)		4	
	10-0-3	Doors		4	
	10-0-4	Mufflers		2	
	10-0-5	Fire Suppression System & Extinguishers		4	
	10-0-6	Four Point Contact/Steps		6	
	10-0-7	Attachments Lowered		4	
	10-0-8	Housekeeping/Appearance		4	
	10-0-9	Emergency Exit		6	
	10-0-10	Visibility/Lights		6	
	10-0-11	Seat Belts		6	
	10-0-12	Communications		2	
	10-0-13	Travel Alarm		4	
	10-0-14	Lock-out Proced./Out-of-Service Tags		6	
	10-0-15	First Aid Kit		2	
	10-0-16	Hydraulics Lockout System		4	
	10-0-17	Ergonomics		4	
	10-0-18	Loading/Crowning		6	
	10-0-19	Pre-Use Equipmet Checklist		6	
			Subtotal		
	11-0-0	Fuel Trucks/Slip Tanks	Possible 22 points		
	11-0-1	Motor Vehicle & Tank		2	
	11-0-2	Motor Vehicle License & Insurance		2	
	11-0-3	Emergency Response + TDG Shipping + Certificate + Photo copy of driver's TDG		4	
	11-0-4	Fire Extinguishers		4	
	11-0-5	Spill Kit & Rupture Seal		2	
	11-0-6	Wheel Chocks		2	
	11-0-7	Reel Controls		4	
	11-0-8	Grounding and bonding on slip tanks		2	
			Subtotal		
			Overall Subtotal		
		Total Possible 202 points			

Job Site Directive book completed & left on jobsite (Y / N)

Environmental Incident Report Required (Y / N)

Notes:

Employees Interviewed (initial)

Equipment Inspected

v - Satisfactory (Full Marks)

O - Needs Improvement (1/2 Marks)

X - Deficiency (0 Marks)

N/A - Not Applicable

Environmental Incident Report Require operation when operations are split

Total Number of Points Achieved

Total Number of Points Achievable

Inspection Score (Achieved / Available) X 100)

Minimum Acceptable Score **90 %** Pass(P) or Fail(F)

Sign - Contractor/Supervisor

Sign - Inspector 1

Sign - Inspector 2

Sign - Supt Responsible for Contractor

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	Environmental Management System (EMS) Compliance Inspections	

Introduction

Corner Brook Pulp and Paper harvests 450,000 to 550,000 cubic metres (m³) annually from the 1.4 million hectares of forest land that it manages on the Island of Newfoundland. The company constructs and upgrades 70+ kilometers (km) of road per year.

Corner Brook Pulp and Paper endorses the policy that we will conduct our forest management activities in a manner that meets or exceeds legal requirements. We will strive to prevent pollution and protect forest resources including timber, soil, water, wildlife, landscape, and biodiversity. We will also continue to promote environmental awareness among our employees and contractors and train employees in their specific environmental and forest management responsibilities. To assist in meeting these objectives, we will monitor our operations regularly through internal inspections and use the results to improve our performance.

This document outlines procedures developed for carrying out internal environmental inspections on our harvesting and road construction operations. The Environmental Management System (EMS) Compliance Inspection was developed by the company's Operations Superintendents in 1997. It is reviewed and revised annually to reflect changes in our operations, our standard operating practices, and our environmental management system.

Corner Brook Pulp and Paper's EMS Compliance Inspections do not attempt to monitor compliance against every guideline or piece of legislation that may affect or relate to what we do. They are intended to provide a snapshot of how contractors are performing in terms of compliance to specific government regulations and selected company environmental guidelines. Many of the items monitored are those that we have control over and that have a significant impact on the environment. Others relate to documentation that we require contractors to have on their job sites. Still other items inspected concern measures to control or mitigate potential impacts in the event that some incident does occur.

There are three EMS Compliance Inspections conducted by CBPP Woodlands:
No. 1 Inspection – Monthly Check-in Contractor EMS Inspection (HR-FRM-01)
No. 2 Inspection – EMS Inspection (HR-FRM-02)
No. 3 Inspection – Harvest Area Completion Inspection (HR-FRM-03)

No. 1 Inspection – Monthly Contractor EMS Inspection (HR-FRM-01)

This inspection is conducted by the Company's Harvesting Contractors (or their designate) on their operations each month. The items included in this inspection are the most important items in the No. 2 Inspection. Contractors are required to complete

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the No. 1 Inspection and review it at their monthly Jobsite Safety & Environment Meeting. They will then review the inspection results at the monthly District Safety & Environment Meetings, at which time they must present a copy of the inspection to their Operations Superintendent. This inspection includes the monthly Leak Report numbers, as well as the Preventative Action Log items.

No. 2 Inspection –EMS Inspection (HR-FRM-02)

This inspection is conducted on our harvesting, road construction, and silviculture contractors by an Operations Superintendent or designate. The No. 2 Inspection is a very comprehensive EMS inspection and is conducted twice per year on Harvesting operations; Silviculture #2 inspections are performed once during the operating season; Roads and Ballast operations have their #2 inspection performed as part of the Roads Staff Inspection Report. The Roads and Ballast contractors will have at least one #2 inspection a year. Contractors are not advised in advance of when No. 2 inspections will take place.

Although the No. 2 inspection is conducted in the current operating area for the contractor, the Inspector must include/look at all operating areas for that contractor for that period. This can be done by looking at the #3 inspection for additional operating areas or by talking to the Operations Superintendent.

No. 3 Inspection - Harvest Area Completion Inspection (HR-FRM-03)

The intent of a Harvest Area Completion Inspection is to ensure that all operating areas are left in a state that minimizes any potential for a negative impact on the environment. The Harvest Area/Road Completion Inspection is conducted on each operating area by an Operations Superintendent, Roads Supervisor, or designate. When a contractor finishes up in a particular area (or portion of an area) and moves to another area, there are basic conditions that must be met before moving.

A map of the area inspected must be attached to the Harvest Area Completion Inspection. The following items are checked in this inspection:

- 2-0-8 Minor fuel/oil spills and stained soil cleaned up
- 3-0-1 Ditches free of debris or obstructions
- 3-0-2 No logging debris in waterbodies
- 3-0-4 Temporary crossings removed
- 3-0-5 Culverts free of debris or obstructions
- 4-0-2 Treed buffer zones maintained
- 4-0-7 No unnecessary trails or disturbance created by machines
- 4-0-9 Trails cut off (or rehabilitated if necessary)

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- 4-0-10 Min. of 10 wildlife trees per ha. left on operating areas
- 5-0-5 Merchantable trees left on cutover/roadside landings
- 5-0-7 All merchantable timber cut in block
- 6-0-4 All garbage removed from site
- 6-0-6 Operations within approved operating areas

Scoring for EMS Compliance and Harvest Area Completion Inspections is described in detail in the next section of this Environmental Work Instruction. If any of the items inspected on the Harvest Area Completion Inspection receive a “Deficiency”, it is recorded in the Contractor’s Jobsite Directive Booklet and followed up in subsequent EMS Compliance Inspections. In addition, the contractor must carry out corrective action as soon as possible so that the harvest area is left in a satisfactory condition. For further details, see “**Job Site Directive Book**”, page 41 of this document.

The procedures outline the reasons for inspecting an item or the regulations that apply to it. The significant environmental aspects (as defined through our environmental management system) of each of the inspection items are listed on the inspection forms and not in these procedures. Criteria for an acceptable job are listed and the reasons for citing deficiencies are outlined.

Recording Basic Job Site and Inspection Category Information

Contractor

Record the contractor’s company name.

Harvesting System

Record whether the harvesting system being used by the contractor is *mechanical* (feller-buncher and processors or shortwood harvesters), or *conventional* (cut and bunch or tree-length). An inspection on road construction should be recorded as *roads*.

Operating Area

Record the name of the operating area as it appears in the company’s Annual Work Schedule.

Forest Management District

Record the number of the Forest Management District where the operating area is located.

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Inspector

Record the inspector's name.

Date

Record the date of the inspection.

Inspection Period

Record the applicable inspection period. No. 2 EMS inspections are generally scheduled three times per year, once during each of the following periods: January – March; May – August; September – December.

Significant Environmental Aspects (SEAs)

Corner Brook Pulp and Paper Woodlands has developed and implemented an environmental management system. The company's internal inspection program has provided a catalyst for changes and improvements to this management system since its implementation. The inspection program has also ensured that all contractor operations are managed in a consistent manner with sound consideration for the environment. A fundamental principle of the inspections however is that each item checked is linked in some way to the significant environmental aspects of our various activities.

A key part of Corner Brook Pulp and Paper's environmental management system is the identification of environmental aspects and the evaluation of associated environmental impacts. An environmental aspect is the element of any activity, product, or service that can interact with the environment. An environmental impact is any change to the environment, adverse or beneficial, which results from an activity, product, or service. As mentioned earlier, the items monitored on our compliance inspection are all linked to aspects of our activities that have been determined to be significant in terms of the impact that they may have on the environment.

Corner Brook Pulp and Paper Woodlands has determined that there are 4 significant environmental aspects (SEAs) of our activities:

1. GHG Emissions & Climate Change
2. Fire
3. Release to Water and Land
4. Natural Resource Management

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These four significant aspects are listed on the inspection form. Reference is also made on the form as to which significant aspects relate to the various items checked during a compliance inspection.

The identification of environmental aspects and the evaluation of associated impacts are part of an ongoing process. A complete breakdown of how Corner Brook Pulp and Paper Woodlands identified our significant environmental aspects can be found in the company's EMS Manual # 4.

Procedures for Conducting Compliance Inspections

Prior to conducting the inspection, the inspector must review supporting information that could potentially affect the outcome of the inspection score or assist with the inspection. Supporting information can include but is not limited to the following:

Past Inspections
Environmental Incident Log

Inspection Scoring Method

A "satisfactory" inspection finding is indicated by a checkmark (✓).

If an item is inspected and is deemed by the inspector to be marginally acceptable or is minor in nature and corrected immediately, it may be recorded as needing improvement. "Needs improvement" items are indicated by a circle (O). "Needs improvement" items are not considered deficiencies however, when tabulating the final score for the inspection these items will score ½ points of the total point value for those items. If **"Needs Improvement"** items are not corrected by the next inspection, it becomes a deficiency.

A "deficiency" on the inspection is indicated by using the letter (X). If a deficiency recorded in an EMS Compliance (No. 2) or Harvest Area Completion (No. 3) Inspection has not been corrected, it is carried over in subsequent inspections until it is corrected. If deficiencies are found after a #2 inspection, change the original #2 inspection, which took place before incident, to reflect a deficiency. Guidelines for the Harvest Area Completion (No. 3) Inspection are indicated in italicized text following the No. 2 requirement. For example:

2-0-8 Minor fuel/oil spills and stained soil

Any fuel, gasoline, or oil spill must be cleaned up immediately.

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If no evidence is found that a fuel, gasoline, or oil spill has occurred, then a “satisfactory” is recorded.

If evidence is found that a fuel, gasoline, or oil spill has occurred and spilled fuel, gasoline, oil, or stained soil (or snow) has not been cleaned up, then a “deficiency” is recorded.

Note: 2-0-8 is also included in the No. 3 inspection

If an item on the compliance checklist does not apply to the operation being inspected, then “N/A” is recorded, designating that item as being “not applicable”. Items deemed to be “not applicable” are not included in the total number of observations when tabulating the final score for the inspection.

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1-0-0 Documentation on Site

This section of the inspection relates to the various documents that Corner Brook Pulp and Paper requires its contractors to have on their job sites.

1-0-1 Forest and Environmental Policy posted on job site

Contractors must have a copy of the most recent revision of the company's Forest and Environmental Policy posted on their job site. For contractors with split operations, the Forest and Environmental Policy is required on the main operation only.

If there is no copy of the Forest and Environmental Policy posted at the job site, or an existing copy is out of date, then a "deficiency" is recorded.

1-0-2 Provincial Fire Season Operating Permit

During the government's designated "Forest Fire Season", each contractor is required to obtain an Operating Permit from Government NL Forestry in the District where they are operating.

If the Operating Permit has not been obtained or is not found at the job site, then a "deficiency" is recorded.

1-0-3 Federal Stream Crossing Authorizations

The federal *Fisheries Act* requires an application for authorization be submitted to Fisheries and Oceans Canada (DFO) for any stream crossing where serious harm to fish cannot be avoided by following standard measures. This can be determined with the use of the Fisheries and Oceans Canada self-assessment tool which helps applicants determine if their project would require a review. The company applies to Fisheries and Oceans Canada for a approval for stream crossings requiring a single culvert not greater than 2000mm in diameter and temporary stream crossings. This blanket permit is always required on site when a stream crossing is present.

The company applies on behalf of the contractors for approval for all crossings requiring a culvert greater than 2000mm in diameter as well as all multiple culvert installs (2 in 1 crossing site). Once the company receives them, they are distributed to the appropriate contractors. Corner Brook Pulp and Paper requires contractors building roads to have any required approvals available at the job site for the inspector to review. If required approvals are not available at the job site, then a "deficiency" is recorded.

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1-0-4 Provincial Stream Crossing Approvals

Legislation states that all watercourse crossings require approval from the provincial Department of Environment and Wildlife. The company applies to the Department for a blanket approval for stream crossings requiring a single culvert not greater than 2000 mm in diameter, temporary stream crossings, and bridges with a maximum span of 5m. This blanket permit is always required on site when a stream crossing is present.

The company applies on behalf of contractors for approval for all crossings requiring a culvert greater than 2000 mm in diameter, bridge spans greater than 5 m and all multiple culverts installs (2 in 1 crossing site). Once the company receives them, they are distributed to the appropriate contractors. Corner Brook Pulp and Paper requires contractors building roads to have any required approvals available at the job site for the inspector to review. If required approvals are not available at the job site, then a “deficiency” is recorded.

1-0-5 Provincial Protected Water Supply Area Approval

Legislation states that a Certificate of Approval must be obtained from the provincial Department of Environment and Wildlife before any harvesting or road-building activity can take place in a protected water supply area.

The company applies for these approvals on behalf of contractors. Corner Brook Pulp and Paper requires contractors to have any required approvals available at the job site for the inspector to review. Inspectors should determine if all permit requirements are being adhered to. If required approvals are not available at the job site, or all permit requirements are not being adhered to, then a “deficiency” is recorded.

1-0-6 Emergency Response Plan / Hazardous Products

Corner Brook Pulp and Paper requires that all contractors have a written plan in place to cover procedures to be followed in the event of an emergency such as fuel or oil spill, forest fire, medical or sedimentation.

Items to be reviewed in the plan: hazardous products checklist, marshalling point, site-specific information, and most recent amendments.

✓ – No concerns.

0 – A hazardous product that is on the job has an SDS Sheet but is not marked on hazardous products checklist.

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X – No copy of the Emergency Response Plan on site; a copy of the plan is available at the job site, but it does not contain current information applicable to that job site; a hazardous product is on the job but is not listed and checked in the Hazardous Products Checklist

1-0-7 Standard Operating Procedures Binder on Jobsite

CBPP has distributed a binder to all contractors containing Standard Operating Procedures (SOP). Additional Standard Operating Procedures are distributed as they are produced.

While inspecting for this item, inspectors should ask to see a copy of the SOP binder which contains these documents. The binder should contain all the documents indicated on the most recent version of the Distribution List for Standard Operating Procedures. For contractors with split operations, the SOP Binder is required on the main operation only.

- ✓ – No concerns.
- 0 – One EWI, SOP is missing from the contractor's set.
- X – More than one EWI, SOP is missing

1-0-8 Proof of waste oil disposal

Waste oil and other lubricants must not be drained onto the ground or into watercourses.

Used waste oil may be stored in the original packaging or in ULC approved containers properly labeled as per WHMIS regulations. While at the jobsite, waste oil containers must be stored in spill basins capable of containing any spilled oil.

Waste oil shall be removed from the jobsite weekly.

Waste oil shall be transported as per the Transportation of Dangerous Goods Regulations.

All waste oil resulting from servicing conducted on the jobsite shall be disposed of at a site approved by the Department of Environment. Contractors must obtain receipts for all oil delivered to approved waste disposal sites and must retain these receipts at the job site for inspection. For contractors with split operations, proof of waste oil disposal is required on the main operation only.

The use of waste oil in chainsaws or harvesters as a chain lubricant is not permitted.

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If evidence is found that waste oil has been drained onto the ground or into a waterbody since the last inspection was completed, then a “deficiency” is recorded.

If evidence is found that waste oil was not stored at the job site in the original packaging or in ULC approved containers properly labeled as per WHMIS regulations, then a “deficiency” is recorded.

If evidence exists that waste oil has not been removed from the job site weekly since the last inspection, then a “deficiency” is recorded.

If evidence exists that waste oil has been disposed of at a site that has not been approved by the Department of Environment, then a “deficiency” is recorded. If contractors do not have appropriate receipts for waste oil disposed of at a Department of Environment approved site, then a “deficiency” is recorded.

If evidence is found that waste oil has been used in chainsaws or harvesters as a chain lubricant since the last inspection was completed, then a “deficiency” is recorded.

1-0-9 Pre-work form posted on jobsite

Prior to a contractor moving into a new operating area a pre-work meeting is arranged. This meeting is held by the Operations Superintendent and the District Planner and is meant for the Contractor and the Front Line Supervisor. At this meeting a Pre-Work Form (EMS # H-FRM-01) is completed and signed off by all in attendance. Operating area maps, photos, buffer maps, road profiles, and if applicable, Provincial Stream Crossing Approvals and Provincial PWSA Approvals are distributed to contractors at this meeting.

If the contractor does not have a copy of the completed “Pre-Work Form” for the specific operating area on his jobsite, then a “deficiency” is recorded.

1-0-10 Employees aware of and know location of Emergency Response Plans/PWSA/Special Considerations

The company believes that its employees must understand their specific responsibilities to protect the environment and know where to look if they require information on a particular subject.

During each inspection, at least one non-supervisory employee must be questioned on his knowledge and understanding of the various environmental emergency response plans (fuel/oil spill, sedimentation and fire) and their location on the operation, PWSA

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requirements or any special considerations. The employee being interviewed should have a reasonable knowledge of what is expected from him, who makes up the emergency response team, and general procedures to be followed, and the location of the Emergency Response Plan.

Scoring on this aspect of the inspection is subject to the inspector's discretion; however, if the employee does not know the location of all required documents, then a deficiency is recorded.

1-0-11 End-Of-Month Check in Logbook Completed

This inspection is conducted by the Company's Harvesting Contractors (or their designate) on their operations each month. The items included in this inspection are the most important items from the No. 2 Inspection, Riparian Crossings, Preventative Action Log, Reminder for Emergency Response Tests, and the Monthly Leak Report. Contractors are required to complete the End-Of-Month Check In and review it at their monthly Jobsite Safety & Environment Meeting. They will then review the inspection results at the monthly District Safety & Environment Meetings, at which time they must present a copy of the inspection to their Operations Superintendent.

Contractors must try to prevent or minimize the occurrence of environmental incidents. Before severe weather events and non-routine tasks and circumstances, contractors must practice preventative actions in anticipation.

For example, when high rainfall amounts are forecast, forwarding trails can be cut off, particularly those where all wood has been removed from the cutover. Water bars can be established to direct running water over the cutover. Forwarding may need to be stopped temporarily on hill sides in anticipation of an incident. Completing rehab on sections of operating areas once complete will prevent incidents.

Abnormal circumstances could include a trained but new employee fueling equipment. To prevent fuel spills and drips, extra measures can be taken to ensure they know the proper procedures. Plastic tarps/basins can be placed under harvester heads during maintenance, and contractors can have refresher chats about environmental risks such as soil disturbance and insufficient wildlife trees. Reviewing risks associated with individual operating areas (slopes, wet areas, major streams) with employees at startup is another example of a preventative action.

Any preventive actions taken by the contractor must be recorded in their Jobsite Preventive Action Log, which should be available on site for Inspectors.

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- √ - End-of-Month Check in current.
- 0 – End-of-Month Check in not completed consistently since last inspection and/or sections not filled in.
- X – No entries in End-Of-Month Check in book.

1-0-12 Adequate Stream Crossing Notification

A notification procedure exists for culvert installs and temporary stream crossings. This is a condition of the provincial Water Resources Management Division and Fisheries and Oceans Canada blanket permits and the Certificate of Managed Land. The notification procedure involves submitting a map that outlines our AOP, estimating the number of temporary crossings expected within that area and the expected time frames (dates each contractor will start and finish work for each area) prior to commencing work. Once the area is completed, the exact number of crossings must be reported to Water Resources Management Division and Fisheries and Oceans Canada along with locations and pictures (Completion report which is a condition of our blanket permit).

One (1) week prior to installation, Contractors must send to the Roads Technician a map that outlines our AOP, estimating the number of temporary crossings expected within that area and the expected time frames (dates each contractor will start and finish work for each area). Once the area is completed, the exact number of crossings, along with locations and pictures, must be sent to the Roads Technician.

Inspector will have to check with Roads Technician before conducting the inspection if proper notification for a temporary crossing has been given, and that all pictures were submitted. Inspector should verify all temporary crossings on site.

- √ - Proper notification has been given, and all pictures were submitted.
- 0 – Notification given but not all pictures submitted
- X – Proper (timely) notification not given and/or pictures not submitted

2-0-0 Fuel/Oil Storage, Handling and Disposal

This section of the inspection deals with some of the more important operational regulations and guidelines that Corner Brook Pulp and Paper requires its contractors to comply with, in terms of fuel and oil storage, handling, and disposal.

If the operation is within a PPWSA area – refer to permit regulations. All Protected Public Water Supply Area (PPWSA) development permit restrictions are to be followed and may differ from site to site. If a deficiency is found an EMS incident report must be completed with an incident investigation.

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2-0-1 Fuel/Oil > 100 m from waterbodies (or as per PPWSA Permit)

Legislation states that gasoline and fuel storage tanks or other stores of oil or lubricants must be placed at least 100 metres from the nearest waterbody.

Gasoline and fuel storage tanks or other stores of oil or lubricants must be placed in a safe location. Oils and lubricants must be securely stored in a dry location.

If any gasoline or fuel storage tank or other store of oil or lubricants is stored within 100 metres of a waterbody, then a “deficiency” is recorded.

If in the opinion of the inspector, a gasoline or fuel storage tank or other store of oil or lubricants has not been placed in a safe location, then a “deficiency” is recorded.

If oils or lubricants have not been securely stored in a dry location, then a “deficiency” is recorded.

2-0-2 Fuel storage tanks registered with Service NL, placarded as per TDG requirements, inspected and in good condition.

Legislation states that all tanks used for fuel or gasoline storage must be registered with the provincial Service NL. To be registered, above-ground fuel or gasoline storage tanks must be constructed and shop tested to meet or exceed the U.L.C. -S601 standards and must bear a U.L.C. label as well as a WHMIS label. A copy of the registration must be available for the inspector to check at the job site. The registration number for the tank must also be printed on the tank as per the conditions of registration.

A fuel or gasoline storage tank must be surrounded by a dyke (e.g. GEEP tanks, or double walled, vacuum-sealed tanks). In the case of double walled, vacuum-sealed tanks, the vacuum gauge must be working and must indicate that the vacuum seal has not been broken.

Trailers and trucks, on which fuel or gasoline storage tanks are mounted, for transport on the job site, must be placarded on all sides. Transportation of dangerous goods placards must be red and diamond-shaped to indicate that the tank contains a flammable liquid. Placards must also show the product identification number for diesel fuel (1202) or gasoline (1203).

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Fuel trucks purchased from fuel distributors are not considered to fall into the category of fuel storage and therefore, do not need to be registered with the Department of Government Services and Lands. They must, however, be placarded on all sides as per the standards for transportation of dangerous goods stated above.

Fuel storage tanks and fuel trucks must bear a “No Smoking” sign close to the nozzle, so it can be seen by the individual dispensing the fuel.

Unless they are periodically placed on the ground, slip tanks used in pickups or other tanks carried by equipment, which are being used to transport fuel to other machines, are not considered to be fuel storage tanks. As such, they do not need to be registered with the Department of Government Services and Lands.

Fuel tank condition will be examined and noted in the Directives Book during the number 2 inspections i.e. rust, requiring paint, etc. This work will be used to assign light duty work when required. A “Needs Improvement” will be given if work is required to improve the condition of the tank.

If all fuel or gasoline storage tanks are not registered with the Department of Government Services and Lands, then a “deficiency” is recorded.

If a copy of the registration is not available for the inspector to check at the job site, then a “deficiency” is recorded.

If any registered fuel or gasoline tanks do not have the tank registration number printed on the tank, as per the conditions of the Department of Government Services and Lands registration document, then a “deficiency” is recorded.

If all fuel or gasoline storage tanks are not suitably dyked, then a “deficiency” is recorded. In the case of double walled, vacuum-sealed tanks, if the vacuum gauge is broken or is indicating that the vacuum seal has been broken, then a “deficiency” is recorded.

If trailers or trucks on which registered tanks have been mounted have not been suitably placarded for transport, then a “deficiency” is recorded.

If fuel trucks purchased from fuel distributors are not suitably placarded, then a “deficiency” is recorded.

2-0-3 Acceptable use and condition of fuel transport tanks/containers, spill kits, and fire extinguishers

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When pickups, small trucks, forwarders, or skidders are used to transport fuel or gasoline tanks, the capacity of the tanks being carried must not exceed 1000 litres. The pickup must have a spill kit consisting of a minimum of 10 absorbent pads and a container used to collect and clean up any fuel spilled, and a 5 lb. dry chemical ABC type fire extinguisher in a readily accessible location.

Slip tanks being transported in pickups must be secured to the body of the pickup (directly bolted to the vehicle frame with 4 points of contact or strapped to the cargo box with ratchet straps showing WLL with at least 2 points of contact).

Slip tanks used in pickups or other tanks carried by equipment, which are being used to transport fuel or gasoline, must contain applicable WHMIS labeling to identify the contents and appropriate safe handling procedures. They must also bear a “No Smoking” sign close to the nozzle, so it can be seen by the individual dispensing the fuel.

Fuel or gasoline transport tanks must not be removed from pickups or other equipment and placed on the ground unless they are registered for fuel or gasoline storage and observe registration requirements.

Metal and plastic drums (205 litre capacity) are not acceptable for fuel or gasoline storage or transport and must not be used on company operations.

Slip tank condition will be examined and noted in the Directives Book during the # 2 inspections i.e. rust, requiring paint, etc. This work will be used to assign light duty work when required. A “Needs Improvement” will be given if work is required to improve the condition of the tank.

If transporting fuel or gasoline in the plastic purpose-built containers (jerry cans), gasoline must be stored/transported in the red jerry cans, not in the yellow jerry cans. Similarly, diesel must be stored/transported in the yellow jerry cans, not in the red jerry cans.

If a tank being used to transport fuel has a capacity of more than 450 litres and the tank or the vehicle being used to move it does not have suitable placarding on all sides, then a “deficiency” is recorded.

If a fuel or gasoline transport tank is placed on the ground and is not registered for fuel or gasoline storage, is not dyked, or does not meet or exceed U.L.C. -S601 specifications, then a “deficiency” is recorded.

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If pickups, small trucks, forwarders or skidders are used to transport fuel or gasoline tanks, and the capacity of the tanks exceeds 1000 litres, then a “deficiency” is recorded.

If slip tanks used in pickups, or other tanks carried by equipment, which are being used to transport fuel or gasoline are not secured or do not contain applicable WHMIS labeling to identify the product and appropriate safe handling procedures, then a “deficiency” is recorded.

If a metal or plastic drum (205 litre capacity) is used for fuel or gasoline storage or transport, then a “deficiency” is recorded.

If a pickup used to transport fuel or gasoline tanks does not have a spill kit and fire extinguisher, then a “deficiency” is recorded.

2-0-4 Servicing > 30 m from waterbodies (or as per PWSA permit)

Legislation states that no heavy equipment or machinery is to be refueled, serviced, or washed within 30 metres of a waterbody or as per permit requirements in a PPWSA.

If equipment has been refueled, serviced or washed within 30 metres of a waterbody then a “deficiency” is recorded.

2-0-5 No drips/leaks from fuel tanks or hoses

All fuel or gasoline tanks must be free of leaks. They must be checked periodically, and if a leak is detected, then it must be repaired immediately.

All fuel tanks for support facility heating systems must be free of leaks and have their fuel lines properly secured.

At least one fuel or gasoline tank must be checked during an inspection. If a leak is detected when inspecting a fuel or gasoline tank, or a fuel line is not properly secured then a “deficiency” is recorded.

2-0-6 Proper refueling procedures followed/TDG Certificate

Machines must be turned off when refueling. To minimize the risk of spilling fuel, persons involved in the transfer of fuel must supervise that transfer at all times.

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Employees transporting fuel must have with them a valid Transportation of Dangerous Goods certificate. (See item 9-0-3 in the Health and Safety Inspection Guidelines).

To minimize the risk of spilling fuel, nozzles must also be properly secured when not in use.

If evidence exists that persons involved in the transfer of fuel did not supervise that transfer at all times, then a “deficiency” is recorded.

If the nozzle is not properly secured when not in use, then a deficiency is recorded.

If the machine is not turned off while refueling, a “deficiency” is recorded.

2-0-7 No leaks/drips from equipment hydraulic/fuel hoses

All equipment must be free of hydraulic oil or fuel or other fluid leaks. Equipment must be checked periodically, and if a leak is detected, then it must be repaired immediately.

At least one piece of equipment on an operation must be checked during an inspection.

If a hydraulic oil, fuel, or other leak is detected when inspecting the machine, then a “deficiency” is recorded.

If the monthly leak report has not been submitted to the EMR, then a deficiency is recorded.

2-0-8 Minor fuel/oil spills and stained soil

Any fuel, gasoline, or oil spill must be cleaned up immediately.

If no evidence is found that a fuel, gasoline, or oil spill has occurred, then a “satisfactory” is recorded.

If evidence is found that a fuel, gasoline, or oil spill has occurred and spilled fuel, gasoline, oil, or stained soil (or snow) has not been cleaned up, then a “deficiency” is recorded.

Note: 2-0-8 is also included in the No. 3 inspection.

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2-0-9 Spill kits on all production equipment; Rupture Seal in Ballast Trucks

All production equipment and trucks shall be equipped with a spill kit consisting of a minimum of 10 absorbent pads and a container used to collect and clean up any hydraulic oil spilled while hydraulic hoses were changed or maintained. Excavators and loaders are required to have 20 high performance absorbent pads and an 8-foot sorb-sox boom. Booms must be stored such that they don't become soaked with oil or water.

Ballast trucks must have a "Rupture Seal" product.

At least one machine must be checked during an inspection. If it does not contain the minimum required spill kit, then a "deficiency" is recorded. If any ballast trucks do not have a "Rupture Seal" product then a deficiency is recorded.

2-0-10 Containment basin for fuel, gas, and oil storage/ used batteries

All fuel and gas cans and oil must be stored in a spill basin capable of containing spillage.

Used batteries stored on the jobsite shall be stored out of the weather in a container to prevent spillage. Used batteries should be disposed of at an approved site.

If any fuel or gas cans or oil was not stored at the job site in a spill basin, then a "deficiency" is recorded.

If a battery was not stored at the job site in a spill basin, then a "deficiency" is recorded.

If evidence exists that a battery has been disposed of at a site that has not been approved by the Department of Environment, then a "deficiency" is recorded.

2-0-11 Large spill kit on site

Emergency response in the event of a fuel, gasoline, or oil spill must occur as swiftly as possible.

If a spill occurs, contractors or their supervisors must advise the Operations Superintendent responsible for the operation immediately. If the spill involves more than 70 litres, the Operations Superintendent will have to notify the Government Services Center via their Spill Report Line.

Corner Brook Pulp and Paper requires its contractors to have fuel/oil spill kits on site with an absorbent capacity of at least 216 litres. Kits must include the following

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minimum contents, to be compliant with our Certificate of Managed Lands and our blanket Permit to Alter a Body of Water:

- 25 high performance absorbent pads
- 5 8-foot sorb-sox
- 8 4-foot sorb-sox
- 1 44-litre bag of Oclansorb (or equivalent)
- 1 7-inch by 10-inch sorb-sox boom
- 1 spark proof shovel
- 1 hand operated fuel pump
- Minimum of 10 heavy duty garbage bags (preferably yellow)
- Safety rubber gloves.

If there is a bulk fuel storage facility in a Protected Water Supply Area, the spill kit must contain the following extra equipment:

- 1 fire pump
- 100 metres of fire hose
- 2 hand operated fuel pumps
- 6 empty 45-gallon drums
- 4 long handled shovels
- 2 pick axes
- 10 metres of containment boom
- 25 absorbent pads
- 100 litres of loose absorbent material
- and any additional equipment as required by PWSA Approval.

In some cases, contractors may be working in two or more operating areas. In those situations, the large spill kit may be placed at one location, but smaller ones with a reduced capacity (minimum of 25 litres) are required at each of the other operating areas. These smaller kits must include the following minimum contents:

- 30 absorbent pads
- 3 4-foot sorb-sox
- 1 44-litre bag of Oclansorb (or equivalent)
- 1 repair putty stick
- Heavy-duty garbage bags.

If evidence exists that a spill occurred since the last inspection was completed and a contractor or one of his supervisors did not respond to clean it up immediately, then a “deficiency” is recorded.

If evidence exists that a spill occurred since the last inspection was completed and a contractor or one of his supervisors did not advise the Operations Superintendent responsible for the operation immediately, then a “deficiency” is recorded.

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If a contractor does not have any fuel/oil spill kit on his job site, then a “deficiency” is recorded.

If a contractor working in numerous operating areas has a small fuel/oil spill kit on the job site being inspected but no large kit at one of his other sites, then a “deficiency” is recorded.

If a contractor is working in a Protected Water Supply Area and does not have the extra spill equipment required for his operation, on site and properly stored, then a “deficiency” is recorded.

If fuel/oil spill kits have been used and have not been restocked with the required materials, then a “deficiency” is recorded.

2-0-12 Employees know and understand fuel/oil guidelines

The company believes that its employees must understand their specific responsibilities with regard to protection of the environment. They must also know where to look if they require information on a particular subject.

During each inspection, at least one non-supervisory employee must be questioned regarding his basic knowledge and understanding of guidelines related to fuel/oil storage, handling, and disposal.

Scoring on this aspect of the inspection is subject to the inspector’s discretion.

2-0-13 TDG Equivalency Certificate

A Transportation of Dangerous Goods Equivalency Certificate has been issued to CBPPL and is renewed every five years. To move stationary fuel tanks the contractor is required to have a copy of this certificate and follow all certificate requirements. The certificate must be posted at the job site.

If the certificate is out of date, or not posted, then a “deficiency” is recorded.

3-0-0 Road and Trail Construction

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This section of the inspection deals with some of the more important operational regulations and guidelines that Corner Brook Pulp and Paper requires its contractors to comply with, in terms of access road and extraction trail construction.

3-0-1 Ditches free of debris or obstructions

The purpose of a ditch is to transport water away from the road subgrade. Obstructions placed in ditches cause water to pond and can result in deterioration of the road.

If obstructions are placed or created in a ditch and cause ponding or interrupted flow of water such that damage may result to the road subgrade, then a “deficiency” is recorded.

If a contractor is moving to a new operating area and the ditches have not been cleared of obstructions in his current area, then a “deficiency” is recorded.

Note: 3-0-1 is also included in the No. 3 inspection.

3-0-2 No logging debris in water bodies / centerline brooks

Legislation states that “Woody material of any kind (trees, slash, sawdust, slabs, etc.,) is not permitted to enter a waterbody”. Slash and debris must be piled above the high water mark so that it cannot enter waterbodies during periods of peak flow. An excessive amount of slash debris and tops must not be allowed to fall into “centerlined” streams.

There should be a no-track zone within 3 meters of a centerline stream.

If logging debris of any kind is found in a waterbody or an excessive amount in a centerlined stream during the inspection, then a “deficiency” is recorded.

If there are equipment tracks within 3 meters of a centerline stream, then a “deficiency” is recorded.

Note: 3-0-2 is also included in the No. 3 inspection.

3-0-3 Equipment activity near waterbodies minimized

Legislation states that equipment activity in water crossing areas must be kept to a minimum. Whenever possible, any work is to be carried out from dry stable areas. Excavations must be performed by an excavator working from the bank.

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If the necessary approvals have been obtained, equipment activity around waterbodies must be evaluated by the inspector to determine that water quality, stream flow, and fish passage are being maintained. The contractor's performance related to all criteria for this aspect of the inspection must be scored subject to the inspector's discretion.

3-0-4 Temporary crossings installed, used, maintained, removed.

Temporary stream crossings must be installed, used, maintained, and removed. Temporary crossings should be documented by contractors in their #1 inspection reports. Steps according to permits and SOP *H-01 Cutting Extraction Trails Through Buffers and Installing Temporary Forwarder Crossings* and *R-01 Installation and Removal of Temporary Stream Crossings for Winter Roads* should be followed. If soil (from outside the no-grub zone) is added to stabilize the crossing, a separation layer of geotextile/filter fabric or similar fabric must be used to prevent sediment from entering the stream. Temporary crossings must also be removed as soon as they are no longer required, and the approaches stabilized to prevent erosion. Temporary winter crossings must be removed before spring melt.

Scoring on this aspect of the inspection is subject to the inspector's discretion. However, if evidence exists that a temporary crossing was not installed, used, maintained or removed appropriately, or removed within a reasonable period after it was no longer required, then a "deficiency" is recorded.

Note: 3-0-4 is also included in the No. 3 inspection.

3-0-5 Culverts free of debris or obstructions

The purpose of a culvert is to transport water from one side of a road to the other. Debris in culverts or obstructions across the inlets or outlets can change water velocities and flow patterns, and can result in erosion and damage to the road.

Scoring on this aspect of the inspection is subject to the inspector's discretion. The inspector must examine as many culverts in the operating area as possible. If debris or an obstruction impedes the ability of an inspected culvert to transport water such that damage to the road is likely to result, then a "deficiency" is recorded.

If a contractor is moving to a new operating area and culverts in his current area have not been completely cleared of debris and obstructions, then a "deficiency" is recorded.

Note: 3-0-5 is also included in the No. 3 inspection.

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3-0-6 Right-of-ways narrowed through buffer zones

To reduce erosion potential and protect water quality, Governmental legislation requires that right-of-way widths at waterbody crossings should be kept to a minimum, preferably to the width of the driving surface plus water control features.

The inspector must examine as many of the stream crossing right-of-ways cleared since the last inspection as possible and evaluate the contractor's overall performance. Scoring on this aspect of the inspection is subject to the inspector's discretion.

3-0-7 Employees know and understand road and trail construction guidelines

The company believes that its employees must understand their specific responsibilities regarding protection of the environment. They must also know where to look if they require information on a particular subject.

During each inspection, at least one non-supervisory employee must be questioned regarding his basic knowledge and understanding of guidelines related to road and trail construction.

Scoring on this aspect of the inspection is subject to the inspector's discretion.

3-0-8 No-grub zones maintained

A no-grub zone of undisturbed ground vegetation of 30 metres for a NTS brook or water crossing that requires a 30 metre buffer as per the provinces' Environmental Protection Guidelines must be maintained around the waterbody crossing to minimize the damage to the lower vegetation and organic cover, thus reducing erosion potential.

As well, a 5 metre no grub zone has to be established on both sides of any centreline stream for operational and winter roads.

There are, however, occasions when terrain conditions require a "cut" through the no-grub zone to approach a stream on a reasonable grade. Under these conditions, every effort must be made to divert ditch water out onto surrounding vegetation before it reaches the no-grub zone on either side of the stream. Any ditch through the no-grub zone in these situations must be lined with rock and hay bale sediment traps must be installed to reduce erosion potential and protect water quality.

Scoring on this aspect of the inspection is subject to the inspector's discretion. The inspector must examine as many of the permanent and temporary stream crossings installed since the last inspection as possible and evaluate the contractor's overall

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performance. Unless special circumstances exist, there must be no tolerance for disturbing a no-grub zone. If any no-grub zone has been unnecessarily disturbed since the last inspection, then a “deficiency” is recorded, and an EMS incident report must be completed with an incident investigation.

3-0-9 Borrow pit > 60 m from waterbodies (Applies to ballast operation)

Borrow pits must be constructed according to SOP R-10 *Ballast and Borrow Pit Operations*. Existing borrow pits must be used to minimize the disturbance of productive land. New pits must be located at least 60 metres from the nearest waterbody, and stay away from wetlands, highly erodible soils, and known sensitive areas. Culverts may need to be installed at the entrance to avoid water build-up around the site. Water flow from the area around the borrow pit must be dispersed properly.

If a borrow pit is located less than 60 m from a waterbody, or in a wetland, highly erodible soils, or sensitive area, then a deficiency is recorded, and an EMS incident report must be completed with an incident investigation.

Otherwise, scoring on this aspect of the inspection is subject to the inspector’s discretion

4-0-0 Harvesting

This section of the inspection deals with some of the more important regulations and guidelines that Corner Brook Pulp and Paper requires its contractors to comply with, when carrying out harvesting operations.

4-0-1 Treed buffer zones and boundaries properly flagged prior to harvesting

When harvesting adjacent to a watercourse occurs, the objectives are to minimize erosion and sedimentation, to avoid restricting stream flow, and to ensure fish passage in fish bearing streams. To meet these objectives, Corner Brook Pulp and Paper demands that contractors flag all buffers with pink watercourse buffer zone flagging tape prior to harvesting.

Buffer ribbons are to be placed along the entire buffer zone, including along the road section within the buffer zone and through non-productive areas, and in a manner so that the operator can clearly see and follow the ribbons. The operator should be able to see 2 or 3 ribbons in each direction.

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The following are general operating criteria that apply to buffer zones. More specific criteria, such as those related to operations in Protected Water Supply areas, and those related to wildlife or other concerns, are outlined during the Pre-work meetings.

Corner Brook Pulp and Paper requires that a 30 metre treed buffer zone must be established around all permanent waterbodies, i.e., streams having water flowing in them all year long in a defined channel. All ephemeral streams with channels greater than 2 metre in width must also be buffered. Ephemeral streams have water flowing in them only on an intermittent basis. Ephemeral streams with channels less than 2 metre do not require buffers, but their channels must be flagged prior to harvesting so that equipment operators do not accidentally cross them with their machinery.

Where the slope is greater than 30% there must be a no-harvest buffer of 30 metres plus (1.5 times the percentage of slope). Every reasonable effort must be made to identify intermittent streams and they must also be subject to this buffer requirement.

A minimum 50 metre no-cut buffer is to be left between operations and designated cabin development areas, as well as along major tributaries of scheduled salmon rivers containing spawning and rearing areas for salmon.

A minimum 100 metre no-cut buffer is to be left along the main branch of major scheduled salmon rivers.

There may be instances when the width of a buffer zone is increased to add to its value as a wildlife corridor. These wildlife corridors must be treated no differently than watercourse buffers.

There may be specific instances when terrain conditions require the right-of-way for a road to be harvested inside the boundaries of a buffer zone. In these cases, site specific criteria must be developed. Plans need to be approved by Government of NL Forestry.

Scoring on this aspect of the inspection is subject to the inspector's discretion.

However, if evidence exists since the last inspection was completed that a buffer zone was not flagged prior to harvesting in the area, then a "deficiency" is recorded.

Other boundaries such as AOP, Park, Protected areas etc, may require identification in the field. These boundaries are to be maintained or a "deficiency" and Incident Report is required.

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If evidence exists since the last inspection was completed that buffers were flagged with ribbon that was not pink watercourse buffer zone flagging tape, then a “deficiency” is recorded.

If evidence exists since the last inspection was completed that pink watercourse buffer zone flagging tape was used for any other purpose than flagging a buffer, then a “deficiency” is recorded.

4-0-2 Treed buffer zones and boundaries not maintained

The previous item in these procedures (Treed buffer zones flagged prior to harvesting) deals with buffer zones in some detail.

There is no tolerance for a violation related to harvesting in a buffer zone. If evidence exists that trespass by equipment or harvesting occurred within the buffer zone of an identifiable stream, wildlife corridor, or designated no-cut area since the last environmental inspection was completed, then a “deficiency” is recorded.

If evidence exists that a pulpwood landing or a truck turn-around was established within a buffer zone, wildlife corridor, or designated no-cut area since the last environmental inspection was completed, then a “deficiency” is recorded.

Note: 4-0-2 is also included in the No. 3 inspection.

4-0-3 Brush mats properly prepared

Corner Brook Pulp and Paper encourages cutters and machine operators to prepare bush mats of limbs, tops, and un-merchantable pieces as they work along on their cutting strips. These brush mats serve to minimize rutting and other soil disturbance caused by machines traveling over the area. They also protect regeneration already established on the ground from being destroyed by the machines.

During each inspection, at least one cutter or one harvester/processor operator must be observed or the brush mats created by them examined to determine if an acceptable job is being performed.

Scoring on this aspect of the inspection is subject to the inspector's discretion. Inspectors must be prepared to make a judgement call based on their own individual field experience, as to whether cutters and machine operators observed are doing everything possible to create a satisfactory brush mat.

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4-0-4 Erosion control measures in place on trails

Corner Brook Pulp and Paper requires that erosion control measures (e.g. laying down birch across extraction trails, creating turn-ups on trails, creating water diversion ditches, setting up filter fabric and hay bales in ditches, etc.,) be used to reduce the chances of erosion or sedimentation of waterbodies. Erosion control measures permit water to run off on the downhill side of extraction trails, allow water carrying sediment a chance to be filtered as it travels over the surrounding vegetation, and filters sediment out of water before it reaches waterbodies.

Scoring on this aspect of the inspection is subject to the inspector's discretion. Inspectors must be prepared to make a judgment call based on their own individual field experience, as to whether the contractor has done everything possible to control erosion on extraction trails.

4-0-5 No sediment entering waterbodies as a result of harvesting

Sediment entering a waterbody may have a negative impact on water quality and fish habitat.

Legislation states that any harvesting or road construction operation that directly or indirectly results in sediment entering a waterbody must be dealt with immediately. Failure to comply will result in a halt of operations. The company requires contractors to report any incident that results in sediment entering a waterbody to the Operations Superintendent or Environmental Management Representative.

If a contractor representative reports a sedimentation incident since the last #2 inspection, a "satisfactory" will be recorded.

If since the last #2 inspection a sedimentation incident is reported by a CBPPL representative, government official, or because of an inquiry from the general public that is substantiated by CBPPL, but the contractor can show due diligence, then a "needs improvement" will be recorded.

If since the last #2 inspection a sedimentation incident is reported by someone other than the contractor, and the contractor cannot prove due diligence, then a "deficiency" will be recorded.

4-0-6 Extraction trails located in acceptable locations

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Poorly located extraction trails can be a major source of erosion. The following are general operating criteria that apply to the location of trails.

Trails must be located with the distribution of timber in mind so that no more are established than what are absolutely required.

Trails must be situated to take advantage of natural cross drainage provided by side hill locations.

Major extraction trails must be located across the slope when safe to do so.

On terrain that slopes more than 10%, skidding or forwarding straight downhill for distances exceeding 150 metres without building a turn-up or some form of water diversion ditch must be avoided.

Turn-ups must be established on downhill trails before they enter onto a landing so that sediment-laden water traveling on them can be dispersed over the cutover or surrounding vegetation before it reaches a roadside ditch.

Wherever possible, machines must travel on brush mats established by cutters and harvesters/processors.

Forwarders and skidders must avoid crossing ditches close to where culverts have been installed.

Steel culverts or temporary forwarder bridges must be installed where skidder or forwarder trails cross a ditch to enter onto a road.

Scoring on this aspect of the inspection is subject to the inspector's discretion. Inspectors must be prepared to make a judgment call based on their own individual field experience, as to whether contractors have done everything possible to meet the criteria established for locating and establishing trails.

4-0-7 No unnecessary trails or disturbance created by machines

Extraction trails can be a major source of erosion and therefore must be kept to a minimum. It is a company practice that if an area does get rutted, it is better to go deeper in one place than to make more passes and disturb more ground.

Current legislation and company standard operating practices demand that soil disturbance be minimized. Any disturbance (e.g. machine getting stuck, excessive

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forwarder trails created) that occurs must be rehabilitated immediately to reduce the chances of erosion or other environmental problems.

Ruts

Ruts are defined as the destruction of soil structure caused by a deformation of the soil surface (>30 cm in depth). Ruts typically occur when the downward pressure exerted on the soil exceeds its shear strength and causes failure.

Compaction

Compaction is defined as the increase in soil density that results from the application of stresses, usually of short duration, resulting from the passage of mechanical harvesting equipment (< / = 29 cm in depth).

Soil Displacement (Bulldozing)

Soil displacement involves the mechanical movement of soil or forest floor material by mechanical equipment, exposing the underlying material for a length of at least 5 meters. Soil displacement typically occurs in extraction trails (trails that have been excavated) and landings. Soil displacement also occurs when the tires / tracks of a machine have sunk far enough into the soil that its undercarriage is removing vegetation and “bulldozing” the mineral soil along the extraction trail.

Scoring on this aspect of the inspection is subject to the inspector's discretion. Inspectors must be prepared to make a judgement call based on their own individual field experience, as to whether contractors have done everything possible to limit the number of forwarder and skidder trails, minimize area disturbed, and rehabilitate disturbance immediately.

4-0-8 Equipment did not cross bogs or wetlands without approval

Legislation states that heavy equipment and machinery are not permitted on an unforested wetland or unforested bog (unless frozen) without a Certificate of Approval from the Department of Environment and Labour and without contacting the DFO area habitat coordinator. Verbal approval must also be obtained from the Department of Forest Resources.

If evidence exists that equipment has crossed an unforested bog or wetland area since the last environmental inspection was completed, then a “deficiency” is recorded and an EMS incident report must be completed with an incident investigation.

4-0-9 Trails cut off (or rehabilitated if necessary)

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Current legislation requires that when a trail is on steep ground and is no longer in use, it must be cut off with diversion ditches placed across it.

The frequency of water bars or diversion ditches across trails varies with the slope of the trails but must be such that the chance of erosion during heavy rainfall or spring runoff is eliminated. Sediment from a trail must not be transported by water all the way to a roadside ditch.

Scoring on this aspect of the inspection is subject to the inspector's discretion. Inspectors must be prepared to make a judgement call based on their own individual field experience, as to whether a contractor has satisfactorily cut off extraction trails that are no longer required, within one week. During times of increased risk due to rainfall, spring runoff, etc. rehabilitation may be required in a shorter time frame. However, there must be no tolerance for erosion occurring on a trail that is supposed to be decommissioned. Likewise, there must be no tolerance for sediment being carried from a trail and reaching a roadside ditch. If evidence exists of either situation occurring since the last environmental inspection was completed, then a "deficiency" is recorded.

In addition to the above, for aesthetic purposes, extra effort must be made by contractors to rehabilitate trails on slopes in close proximity to a road. Topsoil must be placed over excavated trails and ruts with exposed mineral soil and the area must be stabilized with slash or hay. If this is not done, then a "deficiency" is recorded.

Note: 4-0-9 is also included in the No. 3 inspection.

4-0-10 Minimum of 10 wildlife trees per hectare left on operating areas/FECVs

Current legislation states that where safety is not an issue, a minimum of 10 wildlife trees or snags per hectare (average on a cut block) or a clump of trees must be left on all harvesting sites.

Wildlife trees retained must include a representation of the larger diameter trees within the stand. Trees with poor form, trees with signs of decay, and unmerchantable dead trees are suited to be wildlife trees.

The operating area should be monitored to ensure no yellow birch >50cm dbh, red pine, white pine, or black ash are harvested, and that a 5m "no machine" zone is left around white pine >50cm dbh.

Scoring on this aspect of the inspection is subject to the inspector's discretion. The number of wildlife trees retained on a harvested area is difficult to measure during an

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inspection. Inspectors must be prepared to make a judgment call based on their own individual field experience.

Note: 4-0-10 is also included in the No. 3 inspection.

4-0-11 Employees know and understand harvesting guidelines/ISO/SFI

The company believes that its employees must understand their specific responsibilities to the protection of the environment. They must also know where to look if they require information on a particular subject.

During each inspection, at least one non-supervisory employee must be questioned regarding their basic knowledge and understanding of environmental guidelines related to harvesting operations. Employees should also be questioned on their knowledge of the EMS, ISO, and SFI standards, in a manner that they can understand. If the employee has little understanding of any standard, the inspector should discuss the information with them.

Scoring on this aspect of the inspection is subject to the inspector's discretion.

4-0-12 Government Approval to Deviate from Guidelines (e.g., Environmental Protection Guidelines)

The inspector should check in the contractor's Directives Book and/or ask the Foreman for any extenuating approval from a government agency to deviate from the Environmental Protection Guidelines (e.g., to allow a narrowed buffer, or not leaving a buffer), or other government guidelines.

- ✓ If the contractor has deviated from government guidelines, and written approval from a government official or a note from the Foreman is evident in the Directives Book, then a **Satisfactory** is recorded.
- N/A at this time.
- X If the contractor has deviated from government guidelines, and written approval from a government official or a note from the Supervisor is **not** evident in the Directives Book, then a **Deficiency** is recorded.

5-0-0 Fibre Utilization

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This section of the inspection deals with some of the more important regulations and guidelines that Corner Brook Pulp and Paper requires its contractors to comply with, in terms of good fibre utilization.

5-0-1 Tops of harvested trees ≤ 8 cm

On company harvesting operations, trees are to be utilized to a top diameter of 8 cm and a minimum length of 2.55 m (This is to ensure the log touches both ends on the horns for safety when moving round wood in shoot gun load wood truck configuration. If round wood is being trucked on legacy trailers with cross load configuration, then a minimum length of 2 meters can be applied.

Permissions may be given in certain circumstances to leave larger tops if harvesting for logs. Inspectors must verify if the operating area has this permission.

Any waste of fibre is unacceptable, but inspectors must be prepared to make a judgment call based on their own field experience as to whether a contractor has done a satisfactory job or not.

5-0-2 Stump heights < 15 cm or acceptable for winter conditions

Current legislation states that on company harvesting operations, stump heights must not exceed 15 cm.

Scoring on this aspect of the inspection is very specific in that if stump heights from summer operations do not meet legal requirements (less than 15 cm) then a “deficiency” is recorded.

In winter deep snow can make it difficult to leave stumps less than 15 cm. This item under winter conditions is scored based on whether the operator is doing an acceptable job in terms of trying to minimize stump heights given snow conditions and equipment in use at the time.

Take measurements of stumps where the harvest is completed and where the operator is currently working to compare and verify that effort is being made to reach the goal of 15cm.

✓ If the average stump height is 15 cm or less, then a Satisfactory is recorded.

If the average stump height is 15 cm or less, but there is a 25% or greater difference in the observed and unobserved stump height, a Satisfactory is recorded.

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If the average stump height is greater than 15 cm, but there is less than 25% difference in the observed and unobserved stump height, then a Satisfactory is recorded.

- X If the average stump height is greater than 15 cm, and there is a 25% or greater difference in the observed and unobserved stump height, then a Deficiency is recorded.

5-0-3 No excessive butt junking

The company strives to follow harvesting practices that maximize wood fibre utilization. Excessive butt-junking to eliminate cull in pieces of pulpwood or in the production of sawlogs is unacceptable.

Visible cull on the end of a tree being butt-junked must not exceed one-half of the diameter of the tree. In trying to achieve this one-half of the diameter specification, an accepted practice is that pieces butt-junked from a tree must not exceed 0.3 metres (30cm) in length. Inspectors are expected to take measurements as needed if butt junking seems to be excessive or the junks are longer than 0.3m.

Scoring on this aspect of the inspection is subject to the inspector's discretion. There must be no tolerance for excessive butt-junking, but inspectors must be prepared to make a judgement call based on their own individual field experience, as to whether contractors have done an acceptable job or not. An exception to this would be if special permission to butt-junk for logs was authorized by CBPPL.

5-0-4 Merchantable trees/brows left on cutover/roadside landings

The company strives to follow harvesting practices that maximize wood fibre utilization. Current legislation states that bulldozing of standing merchantable timber (softwoods and hardwoods) and poor utilization of merchantable softwoods is not permitted. Merchantable pieces of pulpwood and brows of pulpwood must be removed from cutovers or roadside landings and be delivered to the mill while the fibre is still of useful quality. Wood thrown off wood trucks must be cleaned up within 3 weeks.

If an inspector observes any trees pushed down by equipment or otherwise left unprocessed or any merchantable pieces or brows of pulpwood left on a cutover or a landing on a contractor's operation, a "deficiency" is recorded.

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Brows are defined as three or more recoverable pieces of merchantable wood bunched but missed by the forwarder. Exceptions to this would be if special permission to leave merchantable pulpwood was authorized by CBPPL or government.

If an inspector observes any merchantable pieces or brows of pulpwood left lying around so that they are being traveled over and broken by equipment, then a “deficiency” is recorded.

5-0-5 Merchantable timber cut in block/leave areas

Government legislation requires that the amount of merchantable wood left within a harvested area be less than 6.0 m³/ha. Unless specifically left per SOPs H-06 (Leaving Wildlife trees for Biological Diversity) and PL-07 (Pre-harvest Residual Retention Planning), merchantable standing trees must be removed from the operating area and be delivered to the mill.

Scoring on this aspect of the inspection is subject to the inspector’s discretion. Inspectors must be prepared to make a judgement call based on their own individual field experience, as to whether contractors have done an acceptable job or not. If an inspector feels that an area is not within the government requirements of <6.0m³/ha a further utilization inspection must be completed within 1 month of the #2 Inspection. If the results of the utilization inspection are unfavourable, then the #2 Inspection results will be tallied to reflect it and an EMS Incident report must be completed with an Incident Investigation.

Review leave areas with planners in the office before the inspection and again with the contractor during the inspection to validate that leave areas are justified.

5-0-6 Employees know and understand utilization guidelines

The company believes that its employees must understand their specific responsibilities with respect to the protection of the environment. They must also know where to look if they require information on a particular subject.

During each inspection, at least one non-supervisory employee must be questioned regarding his basic knowledge and understanding of environmental guidelines related to fibre utilization.

Scoring on this aspect of the inspection is subject to the inspector’s discretion.

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6-0-0 General

This section of the inspection deals with some of the more important general regulations and guidelines that Corner Brook Pulp and Paper requires its contractors to comply with.

6-0-1 Hay on site for sediment control

Many harvesting areas are prone to erosion. Corner Brook Pulp and Paper requires its contractors to have sediment control materials on site to mitigate the potential impact of its activities.

Harvesting contractors are required to have a minimum of 10 bales of hay (road contractors are required to have a minimum of 5) stored on their job sites at all times, for use in stabilizing soils, filtering sediment-laden water, or mitigating some other environmental problem. The hay must be suitably stored inside a building or off the ground, under a secure plastic cover or tarpaulin.

If a contractor has less than the required bales of hay stored on his job site at the time of the inspection, then a “deficiency” is recorded.

If a contractor has not suitably stored his hay inside a building or off the ground, under a secure plastic cover or tarpaulin, then a “deficiency” is recorded.

6-0-2 Filter fabric on site for sediment control

Corner Brook Pulp and Paper requires its contractors to have sediment control materials on site to mitigate the potential impact of its activities.

Although hay bales are the most effective means of sediment control available, harvesting and road contractors are required to have a minimum of approximately 18.5 square metres (200 square feet) of filter fabric on their job sites at all times, for use in mitigating environmental problems.

If a contractor has less than approximately 200 square feet of filter fabric suitably stored on his job site at the time of the inspection, then a “deficiency” is recorded.

6-0-3 Support facilities > 100 m from waterbodies

Legislation states that operational support facilities must be placed at least 100 metres from the nearest waterbody.

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If any support facility is located within 100 metres of a waterbody, then a “deficiency” is recorded.

6-0-4 All garbage removed from site

Corner Brook Pulp and Paper demands that its contractors and employees keep job sites clean and free of litter. Garbage and parts or other equipment that are no longer useful must be removed from the site promptly for disposal. Garbage must be suitably contained at the job site until it is removed for disposal.

There must be absolutely no tolerance for garbage at a job site that has been improperly discarded or that is not properly contained. Likewise, there must be absolutely no tolerance for garbage not being promptly removed from the job site for disposal. If evidence exists that garbage has not been properly handled at any time since the last inspection was completed, then a “deficiency” is recorded.

Note: 6-0-4 is also included in the No. 3 inspection.

6-0-5 Fire equipment on site and in good working order

Corner Brook Pulp and Paper must ensure that fire suppression equipment is located on all harvesting job sites during the forest fire season and will take all necessary steps to prevent and fight fires within its operating areas.

Prior to the summer operating season, contractors must ensure that they have adequate fire suppression equipment (as indicated on their operating permits) on hand at each of their job sites.

Fire pumps must be in good working order. Pump toolboxes must contain a listing of required contents and all necessary equipment/tools must be present.

Back tanks must be filled and in good working order.

Fire equipment must be stored in a safe, dry location. Fire equipment on roads job sites must be located within 300 m of operating excavator.

If a contractor does not have adequate fire suppression equipment on hand at the time of the inspection, then a “deficiency” is recorded.

If a contractor does not have the required equipment/tools in pump tool boxes and the required listing of contents, then a “deficiency” is recorded.

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If evidence exists that a contractor's fire pumps are not in good working order, then a "deficiency" is recorded.

If a contractor's back tanks are not filled and in good working order, then a "deficiency" is recorded.

If fire equipment is not suitably stored in a safe, dry location, then a "deficiency" is recorded.

6-0-6 Operations within approved operating areas

Corner Brook Pulp and Paper Woodlands operations must be conducted within areas outlined in Annual Work Schedules and approved by the Department of Forest Resources.

If evidence exists that a contractor has operated outside of the defined operating area that was approved by the Department of Forest Resources in the Annual Work Schedule without approval from the Operations Superintendent since the last No. 2 Inspection, then a "deficiency" is recorded.

Note: 6-0-6 is also included in the No. 3 inspection.

6-0-7 Prior directives corrected - #2 inspections

The purpose of the EMS Compliance Inspection is to evaluate a contractor's performance against a set of established regulations and guidelines. The objective is to improve contractor performance by pointing out deficiencies or items needing improvement and working with him to implement better operating practices.

Environmental deficiencies or items needing improvement found in an EMS Compliance (No. 2) Inspection are recorded in the contractor's Jobsite Health & Safety/EMS Inspection Directive Book. This is a formal request made by the Operations Superintendent or inspector to have the problem corrected. For further information, see Jobsite Health & Safety/EMS Inspection Directive Book, page 37, for details.

If corrective action has been requested of a contractor during a previous EMS Compliance (No. 2) and it has not been completed by the date requested in the jobsite directive booklet by the Operations Superintendent or inspector, then a "deficiency" on this aspect of the inspection is recorded.

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6-0-8 Deficiencies Corrected - # 3 inspections

The intent of a Harvest Area Completion (No. 3) Inspection is to ensure that all operating areas are left in a state that minimizes any potential for a negative impact on the environment. A copy of #3 inspections, whether a pass or a fail, will be sent to the contractor by the Superintendent. The inspector can find copies of the #3 inspections at: G:\Woodlands\Woodlands Operations\Inspections\. When deficiencies are found the Contractor must correct them and sign and forward the Non-Compliance Report to the Superintendent.

To encourage prompt correction of deficiencies, the Inspector will check with the Superintendent for any outstanding deficiencies found during # 3 Inspections, before completing the # 2 Inspection form.

If corrective action has been requested of a contractor during a previous Harvest Area Completion (No 3) Inspection and it has not been completed by the date requested, then a “deficiency” on this aspect of the inspection is recorded.

Notes

This section of the inspection form is available to the inspector to record comments or elaborate on specific concerns or deficiencies observed during the inspection. The back of the form may be used if additional space is required.

Total Number of Points Achieved

Point values are associated with each question on the inspection forms. If a “Satisfactory” is recorded, then a contractor receives total points for that question. Half points are recorded for a “Needs Improvement”. Tally the total number of “Points Received” for each section and record the number on the bottom section of the form. If an N/A is recorded for any question, then no points are recorded.

Total Number of Points Available

Talley the “Point Value” for all questions answers with either a “satisfactory”, “needs improvement” or a “deficiency” recorded. Questions answered with a “N/A” should not be tallied. Add all subtotals and record this number on the bottom section of the form.

Inspection Score

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The inspection score is calculated by dividing the “Total Number of Points Achieved” by the “Total Number of Points Available” and multiplying by 100 to obtain a percentage. A score of 100 indicates a perfect inspection result. A lower score indicates greater levels of non-compliance on the inspection.

Minimum Acceptable Percentage Score

There is little tolerance for environmental non-compliance.

Minimum acceptable scores have been established for each category of inspection. Corner Brook Pulp and Paper reserves the right to periodically review and change the minimum acceptable scores for inspections.

No score is recorded in a No. 1 inspection; the required completion of the No. 1 inspection is included when calculating environmental incentive bonuses for contractors.

The minimum acceptable score for a No. 2 inspection during the year is 90%.

The only acceptable score for the Harvest Area Completion (No 3) Inspection is 100 %.

Job Site Directive Book Completed & Left on Job

Jobsite Health & Safety/EMS Inspection Directive Books (HR-FRM-05) are to be completed by inspectors after a #2 inspection to ensure that deficiencies and items needing improvement are corrected promptly. Inspectors are to tear out a copy of the completed form to return to the EMR for filling. The Directive Book in which items needing action are recorded following an inspection is to be always on the job site. When all items are corrected, the contractor/supervisor signs and dates the appropriate sheet in the Directive Book. These Directive Books provide a mechanism for follow-up on any action that is required by contractors.

If a deficiency is not corrected in an EMS Compliance (No. 2), it remains a deficiency under the specific inspection item and a deficiency is received under item 6-0-7 - Prior Deficiencies Corrected. This deficiency is carried over to subsequent inspections until it has been corrected.

Environmental Incident Report Required

Corner Brook Pulp and Paper considers some of the items on the EMS Compliance Inspection to be important enough in nature that if a deficiency is recorded, then it is

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mandatory that an Environmental Incident Report be completed and forwarded to the Environmental Management Coordinator.

The following is a list of the items for which Environmental Incident Reports are required if deficiencies are recorded:

- Item No. 2-0-1 - Fuel/Oil > 100m from waterbodies (> 500m in PWSA)
- Item No. 3-0-8 – If the No-grub zone is not maintained
- Item No. 4-0-2 - Treed buffer zones maintained
- Item No. 4-0-5 - No sediment entering waterbodies
- Item No. 4-0-8 - Equipment did not cross bogs or wetlands without approval
- Item No. 6-0-3 – Support facilities > 100 m from waterbodies
- Item No. 6-0-6 - Operations within approved operating areas.

Depending on the nature or severity of deficiencies observed during an inspection, the inspector may determine an incident to be an environmental non-conformance. If such is the case, then an Environmental Incident Report (C-FRM-01) must be completed by the inspector as indicated above. Depending on the Environmental Incident and need for follow-up an Incident Investigation (C-FRM-02) may be completed.

Signatures

All inspections must be signed by the contractor or his job site supervisor, the inspector who completed the inspection, and the Operations Superintendent responsible for the operation. There must be a complete understanding on everyone's part of the items that were observed and the deficiencies that require corrective action.

There must be discussion between the inspector and the superintendent responsible for the operation to ensure that problems (i.e. buffer cut, no-grub zone disturbed, operating outside approved area) that occurred during the inspection period are recorded because the inspector may or may not be fully aware of them.

Annual Review of Inspections

The Environmental Management System Review Committee will conduct an annual review of inspections at the end of the calendar year, with a view of improving compliance inspections. To help determine what, if any, revisions are necessary the annual review will include the following actions:

- Review changes in the legal requirements for environmental aspects
- Evaluate the summary report of compliance inspections

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Once these actions are complete, the Committee decides on any revisions to the compliance inspections.

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Recording Basic Job Site and Inspection Category Information

Contractor

Record the contractor's company name.

Harvesting System

Record whether the harvesting system being used by the contractor is *mechanical* (feller-buncher and processors or shortwood harvesters), or *conventional* (cut and bunch or tree-length). An inspection on road construction should be recorded as *roads*.

Operating Area

Record the name of the operating area as it appears in the company's Annual Work Schedule.

Forest Management District

Record the number of the Forest Management District where the operating area is located.

Inspector

Record the inspector's name.

Date

Record the date of the inspection.

Inspection Period

Record the period of the inspection. Safety inspections are scheduled three times per year, once during each of the following periods: January – March; May – August; September – December.

Procedures for Conducting Compliance Inspections

Inspection Scoring Method

A “**Satisfactory**” inspection finding is indicated by a checkmark (✓).

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If an item is inspected and is deemed by the inspector to be marginally acceptable or is minor in nature and corrected immediately, it may be recorded as needing improvement. **“Needs Improvement”** items are indicated by a circle (O). “Needs improvement” items are recorded as half the point value when tabulating the final score for the inspection. If **“Needs Improvement”** items are not corrected by the next inspection, it becomes a deficiency.

A **“Deficiency”** on the inspection is indicated by using the letter (X).

If an item on the compliance checklist does not apply to the operation being inspected, then “N/A” is recorded, designating that item as being “not applicable”. Items deemed to be “not applicable” are not included in the total number of observations when tabulating the final score for the inspection.

7-0-0 PERSONAL PROTECTIVE EQUIPMENT

7-0-1 Head Protection – Condition of employment, Requirement of OHS Act, CSA Hi-Vis Orange, Maximum of 5 years from date of manufacture. Mechanics can wear regular welder’s hard hat, but must have 3 reflective stickers on it.

Any hat (ball caps, toques, hoodies) that interfere with the ability of the suspension harness to work properly during an impact, shall not be worn under protective headwear. Hard hat accessories for hot, wet, or cold weather (neck shades, liners, or hoods) must be purpose-made for hard hats and approved by CBPPL Woodlands. Accessories worn on the outside of hardhats must be hi-vis orange.

When the operator is in a piece of equipment, a hard hat must be in the equipment as well.

Silviculture planting crews are to wear ‘Bump Hats’.

✓ - Wearing hard hat; Orange Hi-Vis; Less than 5 years since date of manufacture; harness and styrofoam present and in satisfactory condition. Cracks in styrofoam are considered satisfactory.

O - Hat faded or damaged

X – Not wearing hardhat; not orange Hi-Vis; Hardhat older than 5 years since date of manufacture: Hat liner damaged, Styrofoam damaged (pieces missing) or not present; wearing non purpose-built accessories under hard hat (ball cap, toque, hoodie)

Note: Employees are not required to wear hardhats in the cab of a machine or in commuter vehicles/buses. Hard hats must be worn going directly to setup or

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equipment from commuter vehicle, or vice versa, and from cutting site to lunch shack or bus.

7-0-2 Hearing Protection - Condition of employment for chainsaw / brushsaw operators and any other employees exposed to 85 db or more. The OHS Act requires hearing protection for 8 hours of continuous exposure to 85db.

- ✓ – Wearing approved hearing protection when required.
- O – Earmuffs in poor condition.
- X – Not wearing hearing protection.

7-0-3 Eye Protection – All woodlands employees are required to wear mandatory CAN/CSA-Z94.1 standard eyewear at all times outside of their vehicle while working on CBPP operations. Contractors and CBPPL employees and staff are required to wear safety glasses while conducting any type of work. Approved eye protection for Woodlands will be CSA approved glasses.

Maintenance workers, i.e. mechanics, welders, shall wear CSA-approved eye and face protection for that job during grinding, burning or chipping. All employees shall wear safety glasses when repairing and/or maintaining equipment, including any safe work practice (SWP) as per PPE Policy.

- ✓ – Wearing approved eye protection when required.
- O – Glasses have minor damage.
- X – Not wearing eye protection; glasses have major damage; or safety glasses not aboard truck or equipment.

7-0-4 Safety Footwear - Condition of employment for all employees. All personnel on Woodlands operations must wear footwear with that is CSA approved and displays the green triangle indicating puncture resistance with protective toecaps and steel plate. Footwear must also be a minimum of 6" high. Manufactured Logging Boots can be a substitute. Safety footwear must be worn at all times, including while operating equipment.

Any non-ballistic nylon boot must have good ankle support, a deep tread sole and a steel nose. Boots must be properly secured (i.e. not unlaced). When winter sets in, non-slip grippers are required to be worn in addition to safety footwear if there is ice or snow on walking surface.

- ✓ – Wearing approved safety footwear.
- O – Footwear in poor condition, or boots not properly secured. Non-slip grippers on boots but turned up to top of boot.
- X – Not wearing approved footwear; footwear in extremely poor condition. Not wearing non-slip grippers when required.

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7-0-5 Hand Protection - All woodlands employees are required to wear cut resistant hand protection at all times outside of their vehicle while working on CBPP operations. The minimum standard for gloves will be ANSI Level 4 Cut Resistant Gloves as deemed appropriate by the company. Gloves are to be worn at all times by all CBPPL union and non-union employees including staff. All other gloves (i.e. Rubber, welding, etc.) must be worn with ANSI Level 4 Cut Resistant Gloves underneath. Requirement of OHS Act.

- ✓ – Wearing approved hand protection when required.
- X – Not wearing hand protection when required; gloves not available in equipment.

7-0-6 High Visibility Apparel - All personnel on Company worksites will be required to wear orange, yellow, or red distinguishing apparel (Class II, Level II) containing high visibility material, suitable for daytime or nighttime use, while working around all mobile equipment.

- ✓ - Wearing high visibility apparel
- - High visibility apparel faded or damaged so as to be ineffective
- X – Not wearing high visibility apparel.

Note: Employees are not required to wear high visibility apparel in the cab of a machine or in commuter vehicles/buses. High visibility apparel must be worn going directly to setup or equipment from commuter vehicle, or vice versa, and from cutting site to lunch shack or bus.

8-0-0 SUPPORT FACILITY

Refers to a unit which houses materials that support the operations, including but not limited to setups, lunch shelters, supply trailers, and pickups.

8-0-1 Safe Location and Visibility- Support facilities should be located on the level in a location that does not present the potential for an injury from vehicular traffic on the road or employees working around the trailer. There should also be sufficient parking space around the setup for vehicles regularly present. The entrance to the setup should be adequately lit to allow safe entry and exit after daylight hours.

- ✓ – Located on dry and level ground; if at roadside, has good sighting distance in both directions. Good location – No danger. Sufficient parking space and entrance well lit.
- - Some potential for incident. Trailer should be marked with reflective tape or other means. Some parking space but not enough for normal circumstances. Entrance light doesn't provide enough illumination; bulb burned out.

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X – Dangerous location – e.g. located on steep incline; located on a turn with poor sighting distance. Support facility must be moved. Very little parking space. No entrance light.

8-0-2 Housekeeping - Support facilities should be neat and tidy at all times both inside and outside the trailer. Some items to look for are:

- All tools /devices such as grinders/sharpeners/cutters should have the one set location and be placed there when not in use.
- All spare hoses should be placed well out of the walking /work area.
- There should be an exhaust fan installed as near as possible to hose cutting equipment.
- All Oil containers to have lids on tight at all times.
- All waste oil to be kept in closed containers and removed at the end of the shift that the oil was drained on.
- All fittings / connections/parts to have specific locations that are well marked.
- All items such as fire extinguishers/ first aid kits/ eye wash stations have a designated area and are labeled.
- Generator wires/connections out of the way of work areas or walkways.

✓ – Meets all requirements above.

0 – Minor problem with one or more areas.

X – Does not meet requirements of 1 or more of above criteria.

8-0-3 Safe Heating System - The heating system for all trailers to be one of the following types;

- Electric heaters installed properly and a safe distance from combustible materials, per the installation code for the heaters.

✓ – Acceptable systems, shielding in place.

0 – Materials too close to heat source, damaged screen.

X – System other than above; wiring problems

8-0-4 Steps/Rails/Ladders - The steps to a support facility should be either steel grated or at least have a non-slip surface. A flight of stairs with more than four risers shall be equipped with handrails on any open side of the stairway. The steps should be secured at the top and bottom, and exit onto level ground. Steps should be cleared of ice and snow, and sand or salt should be made available for the steps and surrounding areas.

Any lunch shelter doorway which is 1 ft. or higher from the ground will require steps which are rigid with a non-slippery surface. Any steps, which are more than 2 ft. in height, will require a handrail of sturdy construction.

Ladders must be CSA approved with all labels legible.

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- ✓ – Meets all of the above criteria.
- 0 – Some minor concerns but overall acceptable.
- X – No handrail, or handrail not in place, materials cluttering steps, steps loose, or ice/snow on steps; Ladder not CSA approved or rungs broken.

8-0-5 Oxygen/Acetylene/Propane - Both the oxygen and acetylene cylinders must be upright and secured at all times (empty and full) to side of trailer or in a secured stand for the same purpose. All cylinders must be properly labeled for contents and hazard. Cylinders can be transported either in upright or horizontal position as long as they are secured. All cylinders that are not in use (no gauges attached), either empty or full, should have caps in place. If cylinders are in an enclosed box, the box must be labelled with an identification label.

All gauges are to be clean and easily visible without cracked glass or plastic. All gauges must be hung up or stored out of the way when not in use. Gauges used on oxygen and acetylene tanks must be equipped with flashback valves. These valves can be located either on the tanks or in the lines close to the burning tip. Where hoses are attached to the torch, a crimped fitting is required.

Propane cylinders are permitted to be stored inside setups if the cylinders are secured and stored upright at all times, with the valves turned off when appliances are not in use.

- ✓ – Meets all of the above criteria.
- 0 – Gauges need to be cleaned; labels need to be replaced; gauges not stored/secured properly.
- X – Cylinders on side and not secured in transport; cylinder not secured in trailer; gauge glass broken; no cap on spare cylinder; hoses damaged or worn; tank valves not turned off when not in use; hose clamp used rather than a crimped fitting; enclosed tanks not labeled on the box.

8-0-6 First Aid Kit – According to Newfoundland and Labrador Workplace Safety and Health Act and employer must provide and keep readily accessible the type, size and number of first aid kits meeting the requirement set out in CSA Z1220-17, First aid kits for the workplace. All mechanical setups are to have a First Aid Kit, fully stocked at all times. The kits must be readily visible and accessible, with a sign indicating their location.

The following **First Aid Kit** is required when the number of employees is between 2 and 25 and in a High Risk Workplace Environment. The contents of the kit should include:

Kit Contents:

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- 25 Adhesive Bandages, Assorted sizes
- 5 Plastic Adhesive Bandages (1.25 x 7.6cm)
- 2 Fabric Fingertip Adhesive Bandages
- 2 Fabric Knuckle Adhesive Bandages
- 1 Fabric Patch Adhesive Bandages (5.1 x 7.6cm)
- 5 Junior Bandages
- 12 Gauze Pads, Sterile, 12 Ply (7.6 x 7.6cm)
- 6 Gauze Pads, Sterile, 12 Ply (10.2 x 10.2cm)
- 4 Non Adherent Pads, Sterile (5.1 x 7.6cm)
- 1 Abdominal/Combine Pads (12.7 x 22.9cm)
- 1 Conforming Stretch Gauze Bandage (5.1cm x 1.8m)
- 1 Conforming Stretch Gauze Bandage (7.6cm x 1.8m)
- 1 Compress Pressure Bandage with Gauze Ties, Sterile (10.2 x 10.2cm)
- 1 Compress Pressure Bandage with Gauze Ties, Sterile (15.2 x 15.2cm)
- 2 Triangular Bandage (102 x 102 x 142cm)
- 1 Arterial Tourniquet, Windlass Style
- 1 Adhesive Tape (2.5cm x 2.3m)
- 1 Elastic Wrap Bandages (7.6cm x 4.5m)
- 2 Eye Pad Dressing, Sterile
- 2 Eye Shield, Plastic with elastic strap
- 1 Instant Cold Compress (10.2 x 12.7cm)
- 25 Benzalkonium Chloride Antiseptic Towelettes
- 6 Antibiotic Ointment, Single Use
- 6 Hand Cleaning Moist Towelettes
- 10 Glucose Tablets
- 1 CPR Mask with One Way Valve
- 4 Vinyl Medical Examination Gloves, L, Pairs
- 2 Biohazard Waste Disposal Bag
- 1 Paramedic Scissors, Stainless Steel, 15.25cm
- 1 Forceps, Stainless Steel, Fine Point (11.4cm)
- 1 Padded Malleable Splint (10.8 x 61cm)
- 1 Mylar Emergency Rescue Blanket (132 x 213cm)

✓ – Meets all of the above criteria.

0 – Some minor items such as bandages etc need to be restocked.

X – No First Aid Kit; no gloves or facemasks.

8-0-7 Fire Extinguisher – Each support facility is to have a minimum of 10lbs of extinguishing powder either as cartridge operated or pressurized units. These extinguishers must be inspected annually and proof of inspection must be available. Extinguishers must be easily accessible and identified (labeled). These extinguishers must be inspected and tagged annually. Confirm the pressure gauge is in the operable range. Discharged fire extinguishers must be tagged “out-of-service”.

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- ✓ – Meets all of the above criteria.
- 0 – Fire extinguisher not easily accessible or changes location; no label.
- X – No fire extinguisher or not of required size; gauge showing extinguisher needs to be recharged; no proof of annual inspection.

8-0-8 Eyewash Station - All mechanical setups are to have a readily accessible and filled eyewash station containing proper eyewash solution, not past effective date found on original storage container, sufficient to supply 15 minutes of continuous flow. Five 500 ml eyewash bottles provide 15 minutes of continuous flow. Contractor must inspect eyewash station monthly and record inspection date on a tag attached to the eyewash station. Roads and ballast operations are required to have five 500 ml eyewash bottles complete with eye cups. Bulk refill jugs are not acceptable.

Eyewash fluid has a six-month expiry once the seal is broken. For this reason, and per ANSI Standard 358.1-2014, all eyewash stations must be emptied, thoroughly flushed (drinking water is acceptable for flushing), and refilled with recommended eyewash fluid every six months, as per manufacturer's instructions; record date of refill on a tag attached to the eyewash station.

Inspector should check the level of eyewash in the station and that the station has been inspected monthly and refilled every six months.

- ✓ – Meets all of the above criteria.
- 0 – Bottle/station not filled to fill level, not inspected monthly, or not refilled every six months.
- X – No eyewash station available; bottle or eyewash station empty, fluid frozen or fluid is outdated.

8-0-9 Electrical System - Electrical systems, including generator, wiring, breakers and plug-ins must be of satisfactory installation and maintained in acceptable condition. The setup electrical system must have ground fault interrupter circuits in the panel box, or added to the extension cord, or have a ground fault reciprocal. A grounding rod or manufacturers sticker about internal grounded, is required for all generator-supplied electricity. All lightbulbs must be plastic shatter resistant or have a protective cover (ex. cage or fixture).

The contractor must have proof that the setup was wired by a Red Seal Electrician (signed and certification number indicated). Safety and Training Supervisor keeps proof of certification.

- ✓ – Meets all of the above criteria.
- 0 – Main cords from generator to setup in an unsafe location.

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X – No wall plates over junction boxes or boxes loose; wires frayed or attached improperly; no ground fault interrupter circuit or reciprocal; No proof wired by a Red Seal Electrician; Lightbulbs not covered.

8-0-10 Ventilation – All support facilities where hydraulic hoses are cut off or manufactured or where harmful fumes are present inside the service trailer, must be equipped with some form of ventilation system. Generators cannot operate within the service trailer.

- ✓ – Ventilation system installed with fan guard and working properly
- O – Ventilation achieved through windows or doors located near fume source
- X – No ventilation system installed and fumes present in service trailer. Generator operating inside trailer. No fan guard installed on ventilation system.

8-0-11 Carbon Monoxide Detector – All support facilities must have a Carbon Monoxide detector installed. Inspector must push test button to ensure is working properly.

- ✓ – No concerns
- O – Some minor concerns but overall acceptable
- X – Unacceptable

8-0-12 Safety News Posted – Corner Brook Pulp and Paper requires that all contractors have a bulletin board in all lunch shelters so safety news can be posted. This will assist all employees in keeping informed of all concerns and developments pertaining to the safety program. Safety news includes: the latest jobsite and district safety meetings minutes, the most recently completed #2 safety inspection form and non-compliance report, and a summary report of injuries to date detailed by contractor.

- ✓ – Latest news bulletins posted in clear view; minutes from latest safety meetings (jobsite and district) posted; latest incident reports and investigations posted; latest Intellex report posted.
- O – Items posted, but not easy to read; most but not all items posted with the latest edition.
- X – No safety news posted; posted news not current.

8-0-13 Propane Detector - If propane is used or stored inside the service trailer then there must also be a propane detector present. Because propane is heavier than air and flows downward, the propane detector must be installed 12"-16" from the floor.

- ✓ – No concerns
- O – Some minor concerns but overall acceptable
- X – Unacceptable

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9-0-0 CONTRACTOR REQUIREMENTS

9-0-1 Health and Safety Policy Posted - Copies of the most recent Health and Safety Policy, Early and Safe Return to Work (ESRTW) Policy and Injury Reporting (PRIME) Poster must be posted on the jobsite in an area that makes it accessible to be read by all employees. For contractors with split operations, these posters are required on the main operation only.

- ✓ – No concerns
- 0 – Policy posted but not most recent
- X – No policy posted

9-0-2 First Aid Record Book - A First Aid Record is to be on jobsite at all times. This is to be the location that all injuries/incidents are recorded. The First Aid Record book is to be kept for a period of 5 years after being completed as is required by OHS Act.

- ✓ – No concerns. First Aid Book easily accessible.
- 0 – Book present but not easily accessible.
- X – No First Aid Book found or incidents not reported.

9-0-3 Contractor General Liability Insurance & Operator License and Certification- There must be proof of specified amount of General Liability Insurance as per Contract at the Woodlands office. Proof of insurance may be, but is not required, on site.

Operators **must carry with them** proof of the appropriate class of motor vehicle license for the machine they are operating:

- Heavy equipment operators must have a valid Class 5 driver's license with a Class 8 (traction engine) endorsement and Power Line Hazard certification (proof required on site not on person);
- Drivers of fuel trucks must have a valid Class 5 driver's license with a Class 9 (air brake) endorsement, and Transportation of Dangerous Goods certification;
- Drivers of trucks carrying slip tanks over 450L must have a valid Class 5 driver's license and Transportation of Dangerous Goods certification;
- Drivers of commuting vehicles must have a valid Class 5 driver's license. If the commuting vehicle carries more than 12 passengers, the driver must have a valid Class 4 driver's license.

- ✓ – No concerns.
- 0 – Training matrix indicates operator has appropriate class of motor vehicle license, but operator does not carry proof.

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X – No proof of General Liability Insurance; no proof of appropriate valid driver's license, power line hazards certification, or transportation of dangerous goods certification.

9-0-4 Orientation Forms and Workplace Violence Assessment - The contractor must have a completed copy of the Worksite Orientation Form for each employee that is on that job. This includes wood truck drivers, and grader and flyer/sand truck operators. This ensures that employees are familiar with Emergency Response Plans, the Job Hazard Analysis (JHA) for their job, and the location of important documents. The orientation form shall:

- Be completed/reviewed with each employee annually at the beginning of a new year, and with new employees before commencing work.
- Indicate what equipment the operator may operate and that the JHA for that equipment has been reviewed.
- Be signed off by the employee, to verify having been made aware of all pertinent information, and by the supervisor.

After a change of operating area, employees are to be notified of the new marshalling point, and any special considerations or PWSA requirements. Employees shall sign and date their orientation form to indicate they have been notified of these changes.

During each inspection, at least one non-supervisory employee must be questioned regarding the requirements listed on the Orientation Form that was reviewed with him by the contractor

Check also for completed Visitor Orientation forms.

Contractors must send Orientation Forms from the previous year to CBPPL's Safety and Training Supervisor.

For contractors with split operations, the Orientation Forms are required on the main operation only.

The purpose of complete a Workplace Violence Hazard Assessment is to create an awareness of possible hazards and risks in the workplace. The assessment identifies who is at risk and what the risk(s) may be to an individual. It is also an opportunity to determine if existing controls that are in place are adequate, and allows for the risk(s) to be prioritized and measured. A Workplace Violence Assessment must be completed for, and available at, each worksite.

✓ – No concerns.

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- 0 – Form not completed for new employee who has worked one week or less on that job.
- X – Forms not filled out or employee not properly advised. Form not completed for new employee who has worked one week on that job. Workplace Violence Hazard Assessment not completed or available for worksite.

9-0-5 First Aid & OHS Act & Regulations. -There has to be a copy of both the OHS act and First Aid regulations on jobsite and easily accessible to all employees. For contractors with split operations, the OHS act and First Aid regulations are required on the main operation only.

- ✓ – No concerns.
- 0 – Act present but not easily accessible.
- X – Either one of the two booklets above mentioned not on jobsite.

9-0-6 Job Hazard Analysis – There must be a copy of the most up-to-date Job Hazard Analyses applicable to the jobsite on site and it must be easily accessible to all employees. For contractors with split roads operations, the Job Hazard Analysis is required on the main operation only.

- ✓ – No concerns.
- 0 – Document present but not easily accessible.
- X – Job Hazard Analysis not on jobsite.

9-0-7 WHMIS / Labels / SDS / Hot Work Permits - All petroleum based products and other chemicals covered under Workplace Hazards Materials Information System must be properly labeled as per WHMIS requirements. The yellow (diesel only) and red (gas only) containers with warnings on the container satisfy the WHMIS requirements for labeling.

There must also be a copy of a WHMIS binder containing a specification sheet (Safety Data Sheet - SDS) for each material that is on the jobsite that is covered under WHMIS. These materials must be listed on the hazardous product checklist. The SDS cannot be more than three (3) years old or there must be correspondence from the manufacturer/dealer to state that the SDS is the most current for that product. If Contractor prints SDS off internet, it must be initialed and dated.

Contractor must keep completed Hot Work permits on site until the #2 inspection for the operating period, after which permits may be sent to the Safety and Training Supervisor.

- ✓ – No concerns.
- 0 – Labels faded and need to be replaced; three or fewer MSD sheets are outdated.

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X – WHMIS product without proper label; no SDS binder on site; more than 3 SDS sheets are outdated. Hot work has been conducted but no completed Hot Work permits are on site.

9-0-8 AED/Stretchers/Blankets/Rope/Splints – If the operation has an AED must be hung in an accessible area. There must be a stretcher present at each jobsite. Along with the stretcher there has to be two (2) splints, two (2) woolen blankets, and 50 ft. of suitable rope to be able to securely lash a casualty to the stretcher in the event of a long distance carry over difficult terrain.

✓ – No concerns. If the operation has an AED, the battery is at least 2/3 charge.

0 – Stretcher and materials could be kept in cleaner condition; AED not accessible or battery 1/3 charge.

X – If either one of the stretchers/blankets/rope/splints is missing or it is felt that one of them is not in good enough condition. If the onsite AED battery no charge.

9-0-9 Working Alone / Checklists - Corner Brook Pulp and Paper have a “Working Alone” policy. An employee is considered to be working alone if they are operating under conditions where their well-being cannot be visually checked on at intervals not exceeding two (2) hours. Contractors must have completed Working Alone Checklists for every shift when someone is working alone. Inspectors should check for the current shift’s checklist, and checklists for the past week’s shifts.

✓ – No concerns.

0 – Concerns with the inconsistency of following the policy by contractor or employees.

X – Employees unaware of jobsite policy or practice, or procedures not being followed (Working Alone Checklists not completed).

9-0-10 Truck Ramps - It is the responsibility of CBPP to place truck ramps. It is the responsibility of the contractor and his employees to see that truck ramps are kept clear of debris, in a safe, stable condition and are maintained. This applies to trim ramps, yellow ramps, and load adjustment ramps.

Besides assessing the ramps for amount of debris, the inspector should closely inspect the structure for missing and/or broken supports, a horizontal mid-rail, any substantial bending of the iron which may create cracks, and visible reflective tape. A kick plate is not required on the truck side, but the back side must have either a kick plate or lower rail. Contractor is to inspect the ramps and aligners monthly as part of the #1 inspection, and notify the Operations Superintendent of any structural issues that need to be addressed.

✓ – No concerns.

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0 – Minor problem with ramps.

X – Major problems with ramps not reported to CBPPL, or prior needs improvements not corrected.

9-0-11 Motor Vehicle Inspection, Insurance, Registration & Pre-Use Equipment Checklist in Commuting Vehicle

- All vehicles that are used to transport employees that are owned by the contractor and owner operated vehicles that are used to transport more than the owner are required to have an annual inspection. They are also required to be registered and insured. All buses including vans will be required to have two inspections per year as per current Provincial regulations.

Drivers of commuting vehicles must complete the Pre-use Equipment Checklist for Light Trucks before picking up any employees for the commute to the job site. Inspectors must check if the Pre-use Equipment Checklist book is in the commuting vehicle and if it is being completed properly.

✓ – No concerns.

0 – Concern with some operational aspect of vehicle; minor issues with the completion of Pre-use Equipment Checklist.

X – Either one of the inspection, insurance or registration not in conformance; Pre-use Equipment Checklist book not present; checklist completed sporadically; identified defects not being dealt with in a timely manner.

9-0-12 Fire Extinguisher in Commuting Vehicle - All buses, vans, commuting vehicles, contractors' pickups, and Company-owned pickups are required to have at least a five (5) lb. dry chemical ABC type fire extinguisher on board in a readily accessible location. Fire extinguishers are to be secured in a readily accessible location, with a sign identifying the location. These extinguishers must be inspected and tagged annually. Confirm the pressure gauge is in the operable range.

✓ – No concerns.

0 – Fire extinguisher could be in better location; no sign to indicate location of fire extinguisher.

X – No fire extinguisher present. Gauge not working on fire extinguisher. Fire extinguisher in poor location, or not secured. No inspection markings.

9-0-13 First Aid Kit in Commuting Vehicle - All buses carrying more than 15 employees must have a First Aid Kit complete with contents as listed under 8-0-7. First aid kits must be in a readily accessible location, with a sign identifying the location.

A larger **First Aid Kit** is required when the number of employees is between 25 & 50. This includes contractor setups. The contents of the kit should include:

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Kit Contents:

50	Adhesive Bandages, Assorted sizes
10	Plastic Adhesive Bandages (1.25 x 7.6cm)
4	Fabric Fingertip Adhesive Bandages
4	Fabric Knuckle Adhesive Bandages
2	Fabric Patch adhesive Bandages (5.1 x 7.6cm)
10	Junior Bandages
24	Gauze Pads, Sterile, 12 Ply (7.6 x 7.6cm)
12	Gauze Pads, Sterile, 12 Ply (10.2 x 10.2cm)
8	Non Adherent Pads, Sterile (5.1 x 7.6cm)
2	Abdominal/Combine Pads (12.7 x 22.9cm)
2	Conforming Stretch Gauze Bandage (5.1cm x 1.8m)
2	Conforming Stretch Gauze Bandage (7.6cm x 1.8m)
2	Compress Pressure Bandage with Gauze Ties, Sterile (10.2 x 10.2cm)
2	Compress Pressure Bandage with Gauze Ties, Sterile (15.2 x 15.2cm)
4	Triangular Bandage (102 x 102 x 142cm)
1	Arterial Tourniquet, Windlass Style
1	Adhesive Tape (2.5cm x 2.3m)
2	Elastic Wrap Bandages (7.6cm x 4.5m)
2	Eye Pad Dressing, Sterile
2	Eye Shield, Plastic with elastic strap
2	Instant Cold Compress (10.2 x 12.7cm)
50	Benzalkonium Chloride Antiseptic Towelettes
12	Antibiotic Ointment, Single Use
12	Hand Cleaning Moist Towelettes
20	Glucose Tablets
1	CPR Mask with One Way Valve
8	Vinyl Medical Examination Gloves, L, Pairs
4	Biohazard Waste Disposal Bag
1	Paramedic Scissors, Stainless Steel, 15.25cm
1	Forceps, Stainless Steel, Fine Point (11.4cm)
1	Padded Malleable Splint (10.8 x 61cm)
2	Mylar Emergency Rescue Blanket (132 x 213cm)

✓ – No concerns.

0 – Kit present but lacking some minor items; no sign to indicate location of first aid kit, or not readily available.

X – No First Aid Kit present or wrong type first aid kit.

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9-0-14 Communications in Commuting Vehicles - All commuting vehicles are required as per Company policy to have VHF radios in good working order. It is also policy that km markers be called both in and out the woods road.

- ✓ – No concerns.
- 0 – Communications device not clear needs minor repairs.
- X – No communication device present or not working at all. Communications device present but not used as per policy.

9-0-15 Housekeeping in Commuting Vehicles - All commuting vehicles are required to be kept in a neat and tidy condition with no loose items on the floor or seats that could act as projectiles in the event of an incident. This includes fire extinguishers, first aid kits and spare tires.

- ✓ – No concerns.
- 0 – Housekeeping could do with some improvement.
- X – Very poor housekeeping with loose articles in vehicle.

9-0-16 Prior Deficiencies Corrected - #2 Inspection- It is a requirement that all deficiencies from previous #2 inspections be corrected and signed off on with a copy sent to the Operations Superintendent responsible. If a deficiency has not been corrected since the last inspection, then a deficiency is recorded in this category as well as a deficiency is recorded in the original deficient category.

- ✓ – No concerns.
- X – One or more deficiencies not corrected.

9-0-17 Service Trucks – Cab & Box - Spilled fuel, dirt and debris in the truck box and cab can be both a safety hazard and an environmental hazard. To those outside of the forest industry, the housekeeping condition of the truck box and cab is a reflection of a contractor's commitment to safety and the environment. Action should be taken to avoid spills of fuel and oil in the truck box, and unavoidable spills should be cleaned up as soon as possible after they occur. Permanent items in truck boxes should be kept tidy, and garbage must be removed from truck boxes daily. Truck cabs should be kept tidy, to facilitate speedy retrieval of emergency items such as a fire extinguisher, first aid kit, or spill pads. This applies to all trucks used on the job site.

Pickups transporting fuel or gasoline in slip tanks and other equipment carrying tanks to transport fuel or gasoline must be placarded on all sides if the capacity of the tank exceeds 450 litres. Placards must be red and diamond-shaped to indicate that the tank contains a flammable liquid. Placards must also show the product identification number for diesel fuel (1202) or gasoline (1203).

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Pickups, small trucks, forwarders or skidders used to transport fuel or gasoline tanks must contain a spill kit consisting of a minimum of 10 absorbent pads, a container to be used to hold any spilled fuel, and a first aid kit. Vehicles / equipment used for fuel transport must also contain a minimum of 5 lb. dry chemical ABC type fire extinguisher in a readily available location. These extinguishers must be inspected and tagged annually.

- ✓ – No concerns.
- 0 – Housekeeping could do with some improvement; insufficient number of spill pads; minor item missing in first aid kit
- X – Poor housekeeping; no spill kit or fire extinguisher; no placards on truck carrying a tank exceeding 450 litres; no first aid kit

9-0-18 Employees are aware and know location of safety documents

The company believes that its employees must understand their specific responsibilities with regard to health and safety. They must know where to look if they require information on a particular subject, first aid supplies, or medical aids (stretcher and blankets).

During each inspection, at least one non-supervisory employee must be questioned on his knowledge and understanding of the various safety documents and their location on the operation. Such documents include safety news, the Health and Safety Policy, the Early and Safe Return to Work Policy, OHS Act and Regulations, Job Hazard Analysis binder and MSDS binder.

Scoring on this aspect of the inspection is subject to the inspector's discretion; however, if the employee does not know the location of all required documents, then a deficiency is recorded.

9-0-19 Road Signs

It is the responsibility of CBPP to place signs. It is the responsibility of the contractor and his employees to see that signs are in good condition, visible and replaced and maintained as required. This applies to main roadway sign (Contractor is concerned about your safety) with KM channel attached, KM signs along road, active logging operation signs, no hunting signs, etc.

- ✓ – No concerns.
- 0 – Minor problem with signs.
- X – Main roadway sign, active logging operation signs, or no hunting signs (if required) not erected. Major problems with signs.

9-0-20 TAKE 5

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To ensure that all tasks are analysed for hazards and corrective measures are implemented to mitigate identified hazards prior to performing task. Inspectors must check if the operators have a Woodlands Operator TAKE 5 booklet and the mechanic has a Woodlands Mechanical TAKE 5 booklet and if the booklets are being completed properly. All operators, mechanics and sub-foremen are required to complete one entry per day. An additional entry is required for non-routine tasks outside of normal operating activities.

- ✓ – No concerns.
- O – Minor issues with the completion of TAKE 5.
- X – Woodlands Operator TAKE 5 or Mechanical TAKE 5 book not present or completed sporadically.

10-0-0 HEAVY EQUIPMENT

During the course of the year, each piece of heavy equipment (harvester, forwarder, feller-buncher, processor, excavator, loader, dozer, etc.) that is on an operating area must be inspected at least once.

10-0-1 Brakes - All heavy equipment must be equipped with a functional braking system. Rubber tired equipment must have an operational foot brake or hydrostatic braking system and an emergency brake. Both must be tested during the inspection. Tracked equipment must be able to hold its position on slopes without any rolling motion of the tracks. Operators should be asked to demonstrate.

- ✓ – No concerns
- O – Foot brake works fine, however emergency brake requires slight adjustment.
- X – Foot brake or emergency brake not working properly or tracks moving on carrier.

10-0-2 Guards (FOPS/ROPS) - All purpose-built forestry equipment must have a manufacturer-equipped canopy that meets or exceeds current regulations. Inspectors should find a label, usually posted in the cab, which shows that the equipment is certified to ROPS/FOPS standards.

Equipment not specifically constructed for forestry applications (ex. excavators) must comply with the following:

1. A protective structure has to be installed over the cab of the machine with:
 - a. Minimum of 3" square tubing for the frame
 - b. A solid sheet of 1/4" steel plate covering the cab of the machine. If the machine is equipped with an emergency exit in the roof, the canopy has to be constructed in such a way as to not block this exit.

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2. The front window of the machine has to be covered by steel grating with the holes in the mesh not to exceed 4 inches in diameter **or** ½ inch Lexan glass bolted to the outside of the window frame.
3. Windows in the door of the machine have to be protected either by Lexan glass and 5/8 inch hollow steel bars (or equivalent) placed horizontally across the window 6 inches apart **or** by wire mesh covering the window with mesh holes not to exceed 2 inches in diameter.
4. Each machine will be required to have at least one emergency exit that can be accessed from either inside or outside the cab, besides the door of the machine.
5. On machinery with side-mounted booms, the window between the cab and the boom has to be equipped with lexan glass. This window is normally the alternate emergency exit mentioned above.
6. All other windows in the machine, unless they are designated escape routes by the manufacturer, have to be screened with a wire mesh with mesh size not to exceed 2 inches in diameter.

In the case of road construction only excavators that are knocking down trees are required to have the above-mentioned modifications.

- ✓ – No concerns
- O – Cannot find the manufacturer's certificate sticker, but canopy is manufactured and installed by equipment manufacturer or canopy is slightly damaged.
- X – No canopy installed on equipment or canopy is damaged/modified so it does not offer the proper protection.

10-0-3 Doors - All heavy equipment must have properly working doors to allow easy and safe access to the cab of the machine and to provide protection to the operator. Inspectors must check to ensure all doors are in good working order and latch properly as per manufacturer installation (e.g., shocks or straps in place and working). If equipment has factory-installed sensors on doors, ensure they are working.

- ✓ – No concerns
- O – Doors open and close with slight difficulty.
- X – Doors in machine do not work properly or are missing. Doors left open during operation. Sensors on doors not working.

10-0-4 Mufflers - All heavy equipment must be equipped with an approved exhaust system including a muffler.

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- ✓ – No concerns
- O – Muffler in place, however there is a slight exhaust leak.
- X – No muffler installed on machine or muffler has been damaged.

10-0-5 Fire Suppression System & Extinguishers- Heavy equipment used in the bush (harvesters, feller bunchers & processors) must be equipped with a pre-engineered fire suppression system. This system must be inspected and tagged annually. In addition to the detection system, 20 lb. extinguisher must be on board (i.e. 1 – 20 lb. extinguisher or 2 – 10 lb. extinguishers). All other equipment, including forwarders, skidders, graders, ballast trucks & excavators, must be equipped with similar 20 lb. of extinguishing power. These extinguishers must be inspected and tagged annually. Confirm the pressure gauge is in the operable range. For the Ansul Red Line cartridge fire extinguishers, check the red stem indicator on the top which pops up in the center of the fill cap if discharged. These extinguishers must also be located in a place that is easily accessible by the operator in case of fire.

- ✓ – No concerns
- O – Hand held extinguisher is inspected, but no proof available. Security seals holding hose and nozzle in place is broken or missing.
- X – Detection system not working properly, not inspected, or bi-annual inspection tag expired. No inspection on hand held extinguisher or wrong type/size extinguisher. Hand held extinguisher is located in a place where operator cannot reasonably retrieve in case of fire.

10-0-6 Four-Point Contact / Steps - All heavy equipment operators must use four-point contact when exiting or entering the cab of their machine. Four-point contact is described as having at least two hands and one foot, or two feet and one hand in contact with the machine at any given time while focusing your eyes on where you are placing your feet. Inspectors must observe operators exiting cab to evaluate.

The catwalk must be kept clear of snow, ice and debris.

Ladders, steps and handrails should be checked to insure they are not broken and are unobstructed.

- ✓ – No concerns
- O – Condition of equipment does not prevent four-point contact exit, but repair is needed immediately.
- X – Operator exits cab unsafely without using four-point contact. Repair required immediately. Ladders, handles or steps missing.

10-0-7 Attachments Lowered – This section is about de-energizing.

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All heavy equipment operators must ensure that attachments on their machine (i.e. harvesting heads, buckets, grapples, blades) are lowered when not in use or being worked on. For purposes of evaluating this item, all attachments must be lowered or adequately secured when the operator exits the cab of the machine, unless operator intends to work on attachment.

- ✓ – No concerns
- O – Operator stops to talk with supervisor and does not secure or lower attachment.
- X – Operator exits cab and leaves attachment in upright position unsecured.

10-0-8 Housekeeping/Appearance - Inside of the cab should be clean and tidy with no items lying around. Tools should be stored neatly in a toolbox, in the door pocket or in an externally-mounted box. Sharp objects such as chains, knives, or axes are not acceptable items to be stored in the door pocket; otherwise it is left to the inspector's discretion. The outside of the machine should be kept in suitable condition with all guards and hatches in working condition.

- ✓ – No concerns
- O – Some minor cleaning or rearranging of items necessary.
- X – Major cleaning or placement of items required, items required to be removed from the cab, or sharp objects stored in the door pocket.

10-0-9 Emergency Exit - All heavy equipment must have a functional emergency exit, which will allow an operator to exit the cab of his machine in case the normal exit is blocked or broken. Inspectors should ask operator to locate and open the emergency exit during the inspection.

- ✓ – No concerns
- X – Emergency exit not working or not able to be opened.

10-0-10 Visibility/Lights - All heavy equipment used after daylight hours must be equipped with sufficient lighting to enable safe and efficient use. Inspectors must inspect all lighting on machine. As a rule of thumb the entire working area should be illuminated. For this item inspectors should also take note of the condition of the glass in the cab to ensure the glass is intact and not broken.

Inspectors are to take into consideration that equipment with Xenon lightbulbs will not require as many lights as those using regular light bulbs.

- ✓ – No concerns
- O – There is one light per side not working

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X – There is more than one light per side not working, or the operator’s view is obstructed in any way; glass is in poor condition, broken or missing.

10-0-11 Seatbelts - All heavy equipment operators are required to wear seatbelts at all times.

- ✓ – No concerns
- O – Seatbelt not working
- X – Operator observed not wearing seat belt.

10-0-12 Communications - All heavy equipment must be equipped with communications in the form of VHF radios. Radios should be checked to ensure they are working properly. VHF antennas should not be mounted inside the cab.

- ✓ – No concerns
- O – Radio needs adjustment (volume)
- X – Radio not present or not working, or antenna inside cab.

10-0-13 Travel Alarm - All heavy equipment must be equipped with an *Automatic Travel Alarm* that is mounted such that it is clearly audible from outside the machine. For rubber tired equipment the alarm must sound when the machine moves in the reverse direction of the operator. In tracked equipment the alarm must sound when the machine moves in any direction; the exception is a dozer, which only requires a backup alarm.

- ✓ – No concerns
- O – Audibility questionable
- X – Not working, not present or not automatic.

10-0-14 Tagout Work Instructions/ Out-of-Service Tags - Each piece of equipment on a jobsite must have a customized Tagout Work Instructions, which should be placed in a plastic sleeve with the out-of-service tags, and stored inside the machine. The Tagout Work Instructions must include the contractor name, location (home base), equipment, and the attachment on the equipment (including contractor’s machine number). The interventions listed on the instructions must apply to the particular piece of equipment, or have been modified to do so. These instructions must be available to the operator, and be produced for inspection when requested.

All heavy equipment must be equipped with two or more out-of-service tags to attach to the machine in case the machine malfunctions and the operator must leave the machine unattended. The tag must be affixed in the cab on the key ring, or as close as possible to the energy-isolating device, in a position that will be immediately obvious to anyone attempting to operate the device. Once tags are removed from equipment, they will be

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kept on file by the mechanic/contractor. Inspectors should check for used tags in the set-up.

- ✓ – No concerns
- O – Operator has difficulty finding the Tagout Work Instructions. Tags are being used, but not on file.
- X – No Tagout Work Instructions in machine; operator not following or not aware of appropriate Tagout Work Instructions. No tags in the cab of the machine or operator is not aware of how to use tags. Machine is observed broke down and operator not around and no tags attached to machine.

10-0-15 First Aid Kit – all heavy equipment must be equipped with at minimum a CSA Type 1 Personal First Aid Kit fully stocked at all times.

Kit Contents:

- 16 Adhesive Bandages, Assorted Sizes (10 Fabric Bandages (2.5 x 7.6cm), 2 Fabric Fingertip Bandages, 2 Fabric Knuckle Bandages, 2 Fabric Patch Bandages (5.1 x 7.6cm)
- 6 Gauze Pads, Sterile, 12 Ply 7.6 x 7.6cm)
- 1 Conforming Stretch Gauze Bandage (5.1cm x 1.8m)
- 2 Compress Pressure Bandage with Gauze Ties, Sterile (10.2 x 10.2cm)
- 1 Triangular Bandage (102 x 102 x 142cm)
- 1 Adhesive Tape, (2.5cm x 2.3m)
- 6 Benzalkonium Chloride Antiseptic Towelettes
- 2 Antibiotic Ointment, Single Use
- 4 Hand Cleansing Moist Towelettes
- 2 Medical Examination Gloves, pairs
- 1 Biohazard Waste Disposal Bag
- 1 Forceps, Stainless Steel, Fine Point (11.4cm)

- ✓ – No concerns.
- O – Kit present but lacking some minor items.
- X – No First Aid Kit present.

10-0-16 Hydraulic Lockout (Safety Interruption) System - All heavy equipment must be equipped with some form of a hydraulic lockout system. This system will vary with different pieces of equipment. Excavators will have a lockout lever attached to the left side of the armrest; some forwarders will not function with the door open. Inspectors must assess each piece of equipment and determine if the lockout function is working properly. To do this the inspector should ask the operator to activate the hydraulic function with and without the lock in place.

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The use of tie straps or any other means to disable the hydraulic lockout system is illegal and therefore not permitted.

- ✓ – No concerns
- O – N/A
- X – Not equipped with hydraulic lockout system. Hydraulic lockout system not working properly, disabled, or deactivated. Device present, i.e., tie strap, that could potentially be used to disable lockout.

10-0-17 Ergonomics - Refers to how environmentally friendly the cab of the machine is on the operator's body. Inspecting for this item includes checking several things. They include:

- Is the seat adjusted properly for the weight of the operator?
- Are the arm rests adjusted properly to ensure arms are at in a neutral position?
- Is the seat in the proper location to allow access to foot controls?
- Are the seat and armrests in good condition to offer proper support?
- Does the seat offer proper lumbar back support?
- Are there extra items in the cab of the machine that do not permit the operator to sit properly or that hinder his work?
- Is the cab equipped with proper ventilation/heat/air conditioning?

- ✓ – No concerns
- O – Some minor concerns but overall acceptable. If the operator is not aware of how to adjust functions of the seat.
- X – If any of the above listed questions are answered “no”, or if any of the seat functions are not working properly.

10-0-18 Loading / Crowning – In order to ensure that all loads of wood are properly secured for transport, loader and forwarder operators as well as truck drivers are to ensure front and rear racks (tri-axel) and/or trailers (b-train) are sufficiently crowned. Sufficient crowning will maximize load surface contact of the securing mechanism, facilitate 60% contact of the securing mechanism to the top of the load, and ultimately ensure the load is safe for transport.

If the inspector observes questionable loading/crowning procedures, ensure that a photo is taken of the load. Discuss with the supervisor who is onsite during the inspection.

For all requirements on loading/crowning and binding refer to SOP SA-11 Wood Trailer Load Binding.

- ✓ - $\geq$ 60% Contact
- O – There is no Needs Improvement for this item

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X - < 60% Contact

10-0-19 Pre-Use Equipment Checklist – To ensure heavy equipment are safe to operate, a pre-use equipment checklist must be completed before each shift, and reflect the true condition of the equipment. The pre-use equipment checklist book should be kept in the cab of each piece of heavy equipment. Inspectors must check if the Pre-use Equipment Checklist book is in the cab and if it is being completed properly, including cross-referencing items in the checklist in real time with the equipment condition.

If a deficiency is identified during the inspection in the following, but it is not identified in the Pre-use Equipment Checklist, a deficiency is recorded:

- 11-0-5 Fire Suppression System & Extinguishers
- 11-0-9 Emergency Exit
- 11-0-11 Seatbelts
- 11-0-17 Ergonomics

✓ – No concerns.

O – Minor issues with the completion of Pre-use Equipment Checklist.

X – Pre-use Equipment Checklist book not present; checklist completed sporadically; identified defects not being dealt with in a timely manner.

11-0-0 FUEL TRUCKS/SLIP TANKS

11-0-1 Motor Vehicle and Tank Inspections - Fuel trucks require an annual motor vehicle inspection certificate.

As of December 31st 2010, all tank trucks used to transport fuel on your operations must meet CSA B620 requirements. Meeting this truck tank specification is a requirement of the Transportation of Dangerous Goods regulations section 5.14. This is in addition to our current requirements that all trucks pass Department of Transportation's Motor Vehicle inspections. The VK (visual) inspection must be conducted annually, and the IP (internal pressure) every 5 years.

✓ – No concerns

O – One inspection certificate not present on job

X – Either inspection expired or past Needs Improvement not corrected

11-0-2 Motor Vehicle License & Insurance - Fuel trucks must be licensed for highway use.

✓ – No concerns

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- O – Vehicle licensed but license plate missing or damaged; Concern with some operational aspect of vehicle (e.g. cracked windshield)
- X – Vehicle not licensed

11-0-3 Emergency Response Plan + TDG Shipping Document – A copy of an Emergency Response Procedure must be posted in fuel trucks. This is usually a one-page plan that contains pertinent information for the operator to follow in case of an accidental spill. A TDG Shipping Document binder must be present in fuel trucks and completed for most recent road travel. A Copy of the TDG certificate for the driver located in the fuel truck.

- ✓ – Plan is aboard fuel truck and contains all information.
- O – Plan is in fuel truck, but is lacking specific information; TDG Shipping Document is not completed. No copy of TDG certificate.
- X – No plan in fuel truck. No TDG Shipping Document binder.

11-0-4 Fire Extinguisher - All fuel trucks are to have a minimum of 20 lb. dry chemical ABC type fire extinguisher in a readily accessible location outside the cab. These extinguishers must be inspected and tagged annually. **In addition**, fuel trucks are required to have a 5lb fire extinguisher in the cab of the truck.

- ✓ – No concerns.
- O – Fire extinguisher could be in better location. Hand held extinguisher is inspected, but no proof available. Security seals holding hose and nozzle in place are broken or missing.
- X – No fire extinguisher present. Gauge not working on fire extinguisher. No inspection on hand held extinguisher or wrong type/size extinguisher. Hand held extinguisher is located in a place where operator cannot reasonably retrieve in case of fire.

11-0-5 Spill Kit & Rupture Seal – All fuel trucks shall be equipped with a spill kit consisting of a minimum of 10 absorbent pads and a container used to collect and clean up any fuel spills, as well as a “rupture seal” product.

If the fuel truck does not contain the minimum required spill kit, or a rupture seal then a “deficiency” is recorded.

11-0-6 Wheel Chocks – All fuel trucks shall be secured with wheel chocks to prevent inadvertent vehicle movement. Wheel chocks must be placed on both sides of one (1) drive axel tire.

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- ✓ – Chocks installed correctly
- 0 – Chocks placed only on downward slope
- X – Chocks installed incorrectly or not present

11-0-7 Reel Controls – During this inspection ask the supervisor to pull out the hose and ensure that the switch operates properly when depressed to recoil the hose. Ensure there are no exposed wires on the controls and that there is a rubber boot over the button portion of the switch.

- ✓ – No concerns
- 0 – Minor repair needed, rubber boot torn or in poor condition.
- X - Boot missing and or exposed wires on control unit.

11-0-8 Grounding and Bonding Equipment on Slip Tanks – Bonding cables shall be used at all times when transferring flammable liquids and must remain effectively attached until all other connections are removed. This is done to prevent accumulation of static electric charge. Static discharging hoses do not substitute as a grounding/bonding cable. Grounding of slip tanks are done through the truck while hooking up power for the pump. When a mobile storage tank gets moved to a new site location, ensure the manufacturer's use and safety instructions are followed (such as driven grounding rod is in place) before use.

Bonding procedures are to be followed when fueling equipment. The cable must be attached to the slip tank and the piece of equipment. Alligator clamps may be used and ensure there is sufficient surface contact.

- ✓ – No concerns
- 0 – There is no NI for this item
- X – No Bonding equipment being used

Notes

This section of the inspection form is available to the inspector to record comments or elaborate on specific concerns or deficiencies observed during the inspection. The back of the form may be used if additional space is required.

Total Number of Points Achieved

Tally the total number of points achieved and record it.

Total Number of Points Available

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Tally the total number of points available and record it.

Inspection Score

The inspection score is calculated by dividing the number of points achieved into the total number of points available. The answer is then multiplied by 100 to arrive at a percentage score. This score is then rounded to the nearest whole number with no decimals using normal rounding techniques. A score of 90% or greater indicates a pass. A higher score indicates greater levels of compliance on the inspection.

Minimum Acceptable Score

The minimum acceptable score is 90%

Pass (P) or Fail (F)

Scores recorded below 90% are considered “fail” while scores $\geq 90\%$ are a “pass”.

Job Site Directive(s) Given to Contractor/Supervisor

Job Site Health and Safety / Environmental Inspection Directive Books are to be completed by inspectors or the Operations Superintendents following an inspection to ensure that deficiencies are corrected promptly. These Directives provide a mechanism for follow-up on any action that is required by contractors.

Signatures

All inspections must be signed by the contractor or his job site supervisor, an Employee OHS Representative (if possible), and the inspector, to ensure that there is complete understanding on everyone’s part of the items that were observed and the deficiencies that require corrective action.

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