



INDUSTRIAL RAILWAY SAFETY MANAGEMENT SYSTEM
(SMS)

GOODRICH TERMINAL 2012 Ltd.,
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OVERVIEW

Goodrich Terminal 2012 Ltd. will operate approximately 1300 feet of track (16 center beam cars), Lumber is the commodities moved on our property and our crews do not go offsite. CN spots the loaded cars to our site and pull the empties. Our crew do not operate when CN is on site. Goodrich Terminal 2012 Ltd. will move about 3000 cars annually.

Bulk cars carrying lumber are handled at the site through railways.



SECTION A - SAFETY POLICY AND ANNUAL SAFETY TARGETS

CANADA REGION SAFETY POLICY

The health and safety of our employees is more than a priority; it is a fundamental value that shapes our continued success and growth. Our health and safety performance are a core value and a common goal of all employees at Goodrich Terminal 2012 Ltd. Occupational injuries and illnesses are preventable. Our goal is to achieve a workplace free from recognized hazards and the associated injuries. To uphold this value, we will manage health and safety as an integral part of our business.

At Goodrich Terminal 2012 Ltd we are committed to:

- Continually pursuing the goal of *Zero Harm* in all of our operations.
- Adhering to the Cardinal Safety Rules and recognizing them as the foundation of Euro Asia’s commitment to *Zero Harm*.
- Complying with and exceeding all health and safety regulations, requirements and standards applicable to our operations.
- Ensuring all of our employees understand that working safe is a condition of employment and that all employees are responsible for their own safety and that of their co-workers.
- Investing in the safest equipment and training programs to ensure that our employees have the tools to achieve *Zero Harm*.
- Identifying and managing potential hazards to prevent occupational injuries and illnesses.
- Ensuring our employees know that they are expected to be involved in safety and have the right to refuse unsafe work.
- Ensuring that employees do not start work until they understand what work is to be done and how to do it safely.
- Continually improving the Safety Program by identifying the root cause of all accidents and implementing corrective actions geared towards lasting improvement.

RAILWAY SAFETY PERFORMANCE TARGETS

Goodrich Terminal 2012 Ltd. sets goals of zero lost time accidents (LTA’S). The performance target for rail related accidents/incidents are zero per year.

Historical Accident Data

Incidents	2018	2019
Involving rail car movements	0	0
Involving Forklift only	0	0
Injuries to operating personal related to train operations	0	0



SECTION B - SAFETY AUTHORITIES, RESPONSIBILITIES AND ACCOUNTABILITIES

ORGANIZATIONAL CHART

Sucha Singh Seikhon -CEO

Company Safety Policy
Company Safety Audit

Sucha Singh Seikhon – HR & Safety

Responsible for Accident investigation and Risk Management
Responsible for Applicable Rule, Regulations, and Standards, Rail Crew Training and Compliances

Parmjit Singh Kang -Warehouse House Manager
Overall Responsibility for SMS and the Performance of the SMS

Rail Crew

Responsible for Conforming to Training and Safety Procedures to move Rail Equipment.

Responsible for Reporting and identifying Risk



SECTION C - EMPLOYEE INVOLVEMENT

Employees at Goodrich Terminal 2012 Ltd. will be consulted in the development and improvements to the SMS through the OH&S committee.

Safety investigations involving accidents, incidents and near misses are conducted by the HR and Safety Manager and Warehouse Supervisor. Recommendations brought forward as a result of these investigations are submitted to the CEO for approval and implemented thereafter.

SECTION D - APPLICABLE REGULATIONS, RULES, STANDARDS AND ORDERS (GUIDELINES)

- Accident & Incident Reporting Guidelines Mining Near Lines of Railways Guidelines Notice of Railway Works Guidelines
- Railway Employee Qualification Standards Regulation Railway Prevention of Electric Sparks Guidelines Railway Safety Appliance Guidelines
- Railway Safety Management Systems Guidelines Wire Crossing & Proximities Guidelines
- Railway Medical Guidelines Equipment Reflectorizing Guidelines
- Canadian Railway Operating Rules Guidelines
- Railway Freight & Passenger Train Brake Inspection & Safety Guidelines Railway Freight Car Inspection Safety Guidelines
- Railway Locomotive Car Moving Equipment Inspection and Safety Guidelines Railway Guidelines Governing Safety Critical Positions
- Rules for the Control and Prevention of Fires on Right of Way Guidelines Respecting Track Safety Rules
- Work Rest Guidelines for Railway Operating Employees Standard Respecting Railway Clearance Guidelines
- Standards Respecting Pipeline Crossings Under Railway Guidelines

Compliance with the rules and regulations will be verified through an audit process conducted through the HR Safety Manager and the Warehouse Supervisor.

The Technical Safety BC website will be used to keep current on any changes to the rules and regulations.



SECTION E AND F - RISK MANAGEMENT PROCESS AND RISK CONTROL STRATEGIES

New risks will be identified formally by employees and management through the monthly safety meetings and pre-shift meetings. Employees and management are required to bring any safety item or risk forward at the time it is discovered.

A risk analysis will be conducted for any new rail practices or procedures as well as any significant changes to existing practices or procedures. This analysis will be conducted through the Warehouse Supervisor.

The identified risks will be assessed and rated using the matrix. The risk will be eliminated if possible and if it cannot be eliminated will be mitigated.

Risk Matrix

SEVERITY				
PROBABILITY	Catastrophic = 4	Critical = 3	Marginal = 2	Negligible = 1
Frequent = 5	unacceptable	Unacceptable	unacceptable	tolerable with mitigation
Probable = 4	unacceptable	Unacceptable	tolerable with mitigation	tolerable with mitigation
Occasional = 3	unacceptable	tolerable with mitigation	tolerable with mitigation	tolerable
Remote = 2	tolerable with mitigation	tolerable with mitigation	tolerable with mitigation	tolerable
Improbable = 1	tolerable with mitigation	tolerable with mitigation	tolerable with mitigation	tolerable

Severity Categories

- Catastrophic** Death or permanent total disability, major property damage, or system loss
- Critical** Permanent partial disability, temporary total disability in excess of 3 months, significant property damage or major system damage
- Marginal** Minor injury, minor occupational illness, lost workday accident, minor property damage or minor system damage
- Negligible** First aid or minor medical treatment, or minor system impairment

PROBABILITY CATEGORIES

- Frequent** Likely to occur frequently (individual), continuously experienced (fleet/inventory)
- Probable** Will occur several times in the life of an item, Will occur frequently in fleet/inventory



Occasional

Likely to occur sometime in the life of an item, Will occur several times in fleet/inventory

Remote

Unlikely, but possible to occur in the life of an item, Unlikely, but can be expected to occur in fleet/inventory

Improbable

So unlikely it can be assumed that an occurrence may not be experienced, Unlikely to occur, but possible in fleet



Risk Analysis

Area	Risks	Control Strategies
Forklift	<ul style="list-style-type: none"> • Derailments causing personal injury, property damage, environmental hazards and customer service issues 	<ul style="list-style-type: none"> • Daily inspections by Frontend Loader operator • Regular maintenance by certified mechanic (every 250 hours) • Rail crew trained on Frontend loader operation and inspection
Track	<ul style="list-style-type: none"> • Derailments causing personal injury, property damage, environmental hazards and customer service issues 	<ul style="list-style-type: none"> • Monthly inspections by recognized railway track inspector • Rail crew vigilance in identifying dangerous conditions
Switches	<ul style="list-style-type: none"> • Derailments causing personal injury, property damage, environmental hazards and customer service issues 	<ul style="list-style-type: none"> • Monthly inspections by recognized railway track inspector • Rail Crew trained on proper operation of switches • Frontend loader operator and ground person to check switch position before moving cars
Rail Cars	<ul style="list-style-type: none"> • Free running cars could result in collisions, derailments causing personal injury and equipment damage • Defective railcars causing personal injury and derailments • Air brake defects or failure to comply with air brake procedures • Defective hand brake or failure to comply with hand brake rule procedures 	<ul style="list-style-type: none"> • Railcar inspection training • Railcar coupling training • Training on safe work practices relating to hand brake application • Railcar air brake procedure training • Training on safe work procedures for railcar loading



Area	Risks	Control Strategies
Employee Behavior	<ul style="list-style-type: none"> • Unsafe work practices • Not following procedures 	<ul style="list-style-type: none"> • Initial training by a recognized institution • On-going recertification • Corrective actions to address unacceptable work habits • Reinforcement of companysafety policy
Employee Fitness	<ul style="list-style-type: none"> • Medical conditions which could affect ability to carry out duties or compromise ability to carry out duties in a safe manner 	<ul style="list-style-type: none"> • Rail crew to pass medical assessment for fitness of duty

SECTION G – ACCIDENT AND INCIDENT REPORTING, INVESTIGATION AND ANALYSIS

All reportable railway accidents as defined by the Technical Safety BC accident reporting regulation, will be reported to Technical Safety BC by phone as soon as practicable using their 24-hour number **1-866-566-7233**. An accident report form will be filled out and faxed to Technical Safety BC after the details have been determined. Within 30 days a full report on the accident investigation will be submitted to Technical Safety BC determining the cause of the accident and necessary corrective action to be taken.

All rail related accidents will be reported immediately to the Warehouse Supervisor, HR & Safety Manager. An accident / incident investigation will be conducted by the Warehouse Supervisor and HR & Safety Manager and the Investigation Report will be filled by the HR & Safety Manager. This investigation will determine the cause, and contributing factors leading to the accident / incident. Corrective recommendations from that investigation will be submitted to the CEO for approval. These approved recommendations will be implemented through the applicable manager and supervisor.

Accident records will be reviewed quarterly and compared to annual safety targets by the CEO.



SECTION H – SKILLS TRAINING AND SUPERVISION

Training

Rail Crew to be trained in the following:

- CROR
- Car Air Brake course
- Freight Car Inspection Rules
- Frontend loader operation and Inspection
- Applicable Euro Asia work procedures

An outside consultant has been contracted to provide training. Training of employees will be coordinated through the Warehouse Supervisor. The Warehouse Supervisor is to ensure all employee qualifications are kept current. Proficiency tests will be carried out annually. The training program will be reviewed annually by the Warehouse Supervisor to ensure it meets all compliance and safety standards. Rail employees will be required to re-certify every 3 years. Any new employee will need to be trained within the completion of 6 months.

Outside contractors and visitors will undergo an orientation which contains an overview of rail operations on the site.

SECTION I – SAFETY PERFORMANCE DATA COLLECTION AND ANALYSIS

The HR / Safety Manager and Warehouse Supervisor will be responsible for reviewing accident data, near misses and proficiency tests on a regular basis to evaluate rail operation in relation to annual safety targets. Accidents and near misses will be reviewed and analyzed to detect possible trends requiring further attention. OH&S committee meetings minutes will be reviewed. The Warehouse Supervisor will ensure that safety performance is not compromised due to sporadic increases in the number of cars handled or hours worked by the Rail Crew.

SECTION J – SAFETY AUDIT AND EVALUTION

Goodrich Terminal 2012 Ltd. will conduct an annual safety audit of its railway operation. This audit will be conducted through the HR / Safety Manager along with a third-party consultant. This audit will look at the accident / incident reports, proficiency tests, track inspections, and Forklift inspections. The results of these audits will be reviewed by the CEO for review and corrective action. Records of this audit will be retained and provided for review, if requested by the pertinent authorities. The Warehouse Supervisor and HR & Safety Manager will conduct regular reviews of the SMS document and work procedures to ensure they are updated and current. The annual safety audit will be completed by July every year. The annual track and switch inspection will be completed by March every year.



SECTION K – CORRECTIVE ACTION DEVELOPMENT, APPROVAL AND MONITORING

It will be the responsibility of the following Supervisors and Managers to monitor any corrective actions that may be required. As a result, recommendations arising from issues identified in sections D through J of the SMS. It will be the responsibility of these Supervisors and Managers to ensure compliance with the corrective actions identified.

- Oversee SMS, corrective actions and evaluate SMS performance – Warehouse Manager
- Accident investigation, risk management, SMS audits – Warehouse Supervisor and HR
- Training and compliance of rules and regulations, SMS audits – HR/Safety Manager
- Maintaining safety records, safety audits – HR/Safety Manager

SECTION L - DOCUMENT LIST AND LOCATION

- Training Records – HR/Safety Manager
- Accident Investigation Records – HR/Safety Manager
- Equipment Inspection Records – HR/Safety Manager
- Track Inspection Records – HR/Safety Manager
- Rail Safety Management System (SMS) – HR/Safety Manager
- OH&S committee meeting minutes – HR/Safety Manager
- Proficiency Test – HR/Safety Manager
- Safety Audits – HR/Safety Manager
- Risk Assessments – HR/Safety Manager