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## Environment, Health & Safety Policy - Contaminated Sites Program

Approved on April 13, 2006

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### PREAMBLE

This Environment, Health and Safety (EHS) Policy provides direction in order to meet the requirements of the Canada Labour Code, applicable environmental regulations and policies, and related policies of the Treasury Board in the implementation of the Northern Affairs Program (NAP) Contaminated Sites Program (CSP). The policy will serve as an integral component of NAP's CSP and applies to all individuals involved with NAP contaminated sites.

### PURPOSE

The purpose of this policy is to ensure that all program activities meet EHS requirements, and to ensure that staff, contractors, visitors, and local communities are not adversely impacted by environmental, health, and/or safety risks associated with contaminated sites.

### REQUIREMENTS

The principal requirement of this EHS Policy is to ensure that EHS Policies and Procedures are in place and implemented, and that all program activities are carried out in a manner that will not adversely impact the environment, health and/or safety. This will be achieved through implementation of an Internal Responsibility System (IRS) where everyone has direct responsibility for environment, health and safety as an essential part of their job, and where each individual who directs or has the power to direct how another person does work understands the legal duty to take reasonable steps to prevent bodily harm to that person, or any other person, or the environment, arising from that work.

### POLICY STATEMENT

Within the Northern Contaminated Sites Program the health and safety of employees and protection of the environment are an over riding priority. Management is committed to doing everything possible to prevent injuries and to maintain a healthy environment. To this end:

- Senior managers are responsible for ensuring that all the requirements of this EHS Policy are fully implemented.
- All managers and supervisors are responsible for ensuring that their employees are trained in safe work procedures, to undertake their assigned duties without accidents, injuries or harm to the environment, and for ensuring that employees follow safe work methods and all related regulations.
- All personnel are required to support and comply with the EHS program, making safety, health and protection of the environment a part of their daily routine, and ensuring that they follow safe work methods and relevant regulations.
- All personnel will be held accountable for implementing, and adhering to, the requirements of the EHS program.
- All personnel are accountable for reporting to their immediate supervisor any unsafe practices or areas in need of improvement. Personnel are further accountable for bringing such reports to the attention of higher levels in the organization, without fear of reprisal, if the situation is not addressed appropriately.
- All relevant Territorial and Federal laws, regulations and policies, including the requirements of

INAC's NAP Contaminated Sites Program Management Framework, are incorporated into our program as minimum standards.

- Pollution prevention practices and programs to achieve continuous improvement will be implemented as an ongoing requirement of the program.
- Where a conflict arises due to different standards or requirements between different regulations or standards, the more stringent of the two will apply.

## GUIDING PRINCIPLES

The EHS Policy will form the basis upon which an EHS management system is developed.

The EHS management system will establish the direction and framework for setting and reviewing regional program and project level EHS objectives and targets.

The EHS management system will document management's commitment to meeting the requirements of this policy.

The EHS management system will demonstrate the alignment of all contaminated site assessment, remediation and risk management activities with the EHS Policy.

The EHS management system will be designed to enable regional programs and projects to maintain and improve EHS performance.

## PROCEDURES

### Corporate:

The INAC Northern Contaminated Sites Program shall develop a "Corporate EHS Manual" that will be applicable to the Program, and will become an integral component of a "Regional EHS Manual."

### Regional:

Each Region shall establish EHS Procedures consistent with the ISO 14001 and OHSAS 18001 requirements, appropriate to the nature, scale and EHS impacts of all Contaminated Sites Program activities. These Procedures shall be documented in a Regional EHS Manual and shall include a commitment to:

- Continual improvement of the EHS program;
- Prevention of pollution or other adverse environmental impacts;
- Prevention of accidents and loss-time injuries;
- Compliance with all relevant EHS legislation, regulations and other applicable federal policies and requirements;
- Development of objectives and targets approved by senior management, to ensure the requirements of the EHS management system are met; and
- Regular monitoring and reporting of the performance against EHS objectives and targets to senior management.

Regional EHS Procedures shall be developed and implemented where required to ensure full implementation of this EHS Policy.

### Project and Site Level:

Project and Site Level EHS Procedures shall be developed and implemented where:

- Required to ensure full implementation of this EHS Policy, and/or

- Where the project level risk assessment identifies significant risks not covered by the NAP Corporate EHS Manual or Regional Procedures.

### **General:**

The EHS Policy, Manual and Procedures will be communicated to employees, contractors and other interested parties in a variety of ways, to be specified in a regional EHS Communications Plan.

The EHS Policy, Manual and Procedures will be reviewed annually and revised, if necessary, as part of the NAP Contaminated Sites Program, Management Review process.

## **APPLICATION**

The EHS Policy applies to all NAP Contaminated Sites Program activities, field operations and facilities, including administration and engineering functions.

## **ROLES AND RESPONSIBILITIES**

Overall responsibility for the EHS Policy rests with the Assistant Deputy Minister (ADM) Northern.

Senior Management (Directors General, and Program Directors)

- Approve EHS policies and programs,
- Ensure regional and project level EHS programs are in place, and
- Ensure the EHS Policy is being implemented as intended.

Project and Program Managers

- Develop project level EHS procedures as required for all EHS risks,
- Ensure all individuals involved with a project (i.e., including Site Operator and DIAND employees, consultants and contractors, and visitors) are aware of and comply with the EHS policy,
- Provide public access to the EHS policy,
- Review the EHS policy periodically with senior management and other managers of the project and make necessary revisions to reflect changes in site or project conditions, regulatory or other requirements,
- Maintain original copies of the EHS policy and revisions, signed by Senior Management, and
- Coordinate the communication of the EHS policy internally and externally.

Site Manager, Line Supervisors, and Task Leaders

- Are aware of and understand the EHS Policy and Procedures, and
- Ensure work activities are performed consistent with the EHS Policy and Procedures.

Workers

- Are aware of and understand the EHS Policy and Procedures, and
- Perform work activities consistent with the EHS Policy and Procedures.

Site Visitors

- Are aware of and understand the EHS Policy and Procedures.

## **REFERENCES**

ISO 14001

OHSAS 18001

NAP Contaminated Sites Management Policy

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