

Sierra Construction and its subsidiary companies believe that we have been given the land and waters in which we live. Therefore, the protection of these gifts is considered to be of paramount importance. The management team is committed to an effective environmental management system based on the ISO 14001 standard, complying with applicable legal requirements, and pollution prevention, and will strive to preserve the land, waters, and the fauna and flora that habitat within these niches whenever possible and practical.

We believe in working closely with the client, applicable government agencies, and the general public to ensure all environmental issues and concerns are addressed and subsequently protected throughout each phase of a project. We will review our environmental performance annually to assess our objectives, and targets and to identify opportunities for continuous improvement.

Management and supervisors recognize and accept their responsibilities to educate, train, and inform employees about the known environmental risks in the general workplace and any specific risks identified in a project. From the start to the completion of a project, we must take the necessary precautions to mitigate possible environmental threats.

Managers and supervisors will be held accountable to ensure we follow our environmental practices and procedures. Employees and subcontractors will also be held accountable for their environmental practices and are to report any environmental threats to their supervisor immediately.

While managers and supervisors are responsible for the implementation and enforcement of our environmental protection policy, we expect all employees, sub-contract employees, and clients to work and conduct themselves in a manner that reflects our commitment to protecting our environment and supporting natural resource conservation in the community. Don't abuse – Recycle, Reduce, Re-Use.

***"Protecting the Environment is
Everyone's Responsibility"***



Brent Zaluski

President

January 2, 2025

PURPOSE

To set the standard and expectations Sierra Construction has for its environmental protection.

DEFINITIONS

“Adverse Effect”

One or more of the following;

- a) impairment of the quality of the natural environment for any use that can be made of it,
- b) Injury or damage to property or to plant or animal life,
- c) Harm or material discomfort to any person,
- d) An adverse effect on the health of any person,
- e) Impairment of the safety of any person,
- f) Rendering any property or plant or animal life unfit for human use,
- g) Loss of enjoyment of normal use of property, and
- h) Interference with the normal conduct of business

“Competent Person/Worker”

A person who is adequately qualified, trained, and with sufficient knowledge and experience to organize and safely perform the work. A person who is also familiar with Sierra Construction’s policies, QC manuals, Health & Safety Manuals, and the provincial occupational health & safety act and regulations.

“Contaminant”

Any solid, liquid, gas, odour, heat, sound, vibration, radiation, or combination of any of them resulting directly or indirectly from human activities that cause or may cause an adverse effect

“Spill”

When used with reference to a pollutant, means a discharge;

- a) Into the natural environment,
- b) From or out of a structure, vehicle, or other container, and
- c) That is abnormal in quality or quantity in light of all the circumstances of the discharge.

REQUIREMENTS

Competent Person/Worker

A competent worker must always lead the environmental procedures, while still taking the considerations from the inexperienced workers (a “fresh set of eyes”).

“Make it Safe”

Prior to beginning any spill clean-up, the health & safety of all individuals must come first. Ensure all precautions have been taken to make the area safe to approach (i.e. Spill source stopped, atmospheric hazards controlled, sources of ignition removed/guarded against, etc.).

RESPONSIBILITIES

Employer

Implement the environmental protection policy, procedure, and processes, and ensure they are being followed as prescribed.

Provide information and assistance that may be required for the purpose of following the environmental protection policy

Supervisor/Managers

Complete their required project hazard assessments.
Ensure workers are following the environmental policy
Report any findings they cannot rectify to the employer

Workers

Follow the environmental policy
Report any findings to their Supervisor/Manager

Sub-Contractors

Follow the environmental policy
Report any findings to their Supervisor/Manager

PROCEDURE

Project Hazard Assessment

Prior to conducting any work on a job site, the Supervisor/Project Manager will conduct a project hazard assessment, which will take into consideration the environmental factors on the job site (i.e. waste disposal, etc.)

Spill Response

In the event of a spill, the most important first step is to "Make it Safe". Take every reasonable step to stop the substance from continuing to spill, as long as it is safe to do so.

From there, the supervisor must be notified right away so they can take the necessary steps to notify the appropriate personnel, such as;

- 1) Project Manager;
- 2) HSE Department;
- 3) Fire Department;
- 4) Hazardous Waste Clean-Up; or
- 5) Etc.

If it is considered a serious or significant spill, clean-up will have to be performed by the properly trained groups (Fire Department, Hazardous Waste Crew, etc.)

If the spill is not deemed "Serious/Significant", then reference the process "PRO 003 – Fuel Handling" and procedure "SOP 904 – Environmental Spill".

Notice of Spills

EPA s. 92(1) - Every person having control of a pollutant that is spilled and every person who spills or causes or permits a spill of a pollutant shall forthwith notify the following persons of the spill, of the circumstances thereof, and of the action that the person has taken or intends to take with respect thereto,

- a) The Ministry;
- b) Any municipality within the boundaries of which the spill occurred or, if the spill occurred within the boundaries of a regional municipality, the regional municipality;
- c) Where the person is not the owner of the pollutant and knows or is able to ascertain readily the identity of the owner of the pollutant, the owner of the pollutant; and
- d) Where the person is not the person having control of the pollutant and knows or is able to ascertain readily the identity of the person having control of the pollutant, the person having control of the pollutant

REFERENCED FORMS

Environmental Protection Act, R.S.O 1990, c. E. 19

O. Reg 675/98 – Classification and Exemption of Spills and Reporting of Discharges

FORM 0225 – Project Hazard Assessment

FORM 1003 – Incident Investigation (Environmental)

PRO 003 – Fuel Handling

SOP 904 – Environmental Spill

REVIEW

This policy & program will be reviewed annually, at minimum, in order to improve its performance.

Prepared/Revised by: _____

APPROVALS			
President		Bridge Management	
Human Resources		GC Management	
HSE Management		Infrastructure Management	
JHSC Member		Marketing Management	

REVISION HISTORY		
Date	Notes	By Whom
February 4, 2008	New Policy	Jonathan Rowe
December 5, 2012	Reviewed Policy Added Pollution Prevention	Jonathan Rowe
December 2, 2014	Reviewed Policy. No Changes	Jonathan Rowe
December 5, 2016	Reviewed Policy. Name change due to splitting of companies	Jonathan Rowe
March 5, 2021	Reviewed Policy. Changed Logo	Jonathan Rowe
March 10, 2022	Major formatting revision Changed the document name from "Pol 1005 – Environmental Protection Policy" to "POL 1015 – Environmental Protection" to meet COR 2020 standards. Added a policy page	Evan Marsh
January 4, 2023	Reviewed. No Changes	Evan Marsh
January 2, 2024	Reviewed Updated reference to Fuel Handling process and Environmental Spill procedure. Updated to new Sierra Construction branding	Evan Marsh
January 2, 2025	Reviewed. Updated document to match new Sierra branding	Sarah Banville/Angela Gascon