



# Report on Trans Mountain's COVID-19 Preparedness and Planning

# FOR TRANS MOUNTAIN PIPELINE TRANS MOUNTAIN EXPANSION PROJECT

October 8, 2020 Version 5.0



Trans Mountain Pipeline ULC

Trans Mountain Canada Inc. Suite 2700, 300 – 5th Avenue S.W. Calgary, Alberta T2P 5J2 Ph: 403.514.6400

# **1** EXECUTIVE SUMMARY

Trans Mountain Pipeline operations is an essential service providing needed transportation for a vital commodity in the Lower Mainland of British Columbia, Washington state and access for Alberta oil and petroleum resources to market. The Trans Mountain Expansion Project (TMEP) is a federally approved infrastructure project that is in the national interest.

Trans Mountain ("the Company") has implemented industry-leading measures to prevent COVID-19 from spreading within its workforce and remains confident that operation of the existing pipeline system and construction of the Expansion Project can continue safely.

Trans Mountain and the Trans Mountain Expansion Project are actively monitoring the COVID-19 situation with the help of federal, provincial, local agencies and authorities, Indigenous communities and industry. The Company is taking appropriate actions with the following key objectives in mind:

- 1. Maintain a safe work environment and ensure business continuity.
- 2. Ensure continued safe operation of the existing pipeline system, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities and the communities affected by Trans Mountain's operations.
- 3. Ensure continued safe operation of the pipeline system.
- 4. Ensure continued safe construction of Trans Mountain Expansion Project.

Trans Mountain activated its Pandemic Preparedness Plan, and the Company has established a Corporate Incident Support Team (CIST) to monitor health and safety while implementing additional appropriate measures to continue operation and construction.

The Company has taken direction from the leading and local health authorities in the country and has implemented high standards of practice including self-isolation where required, safe working conditions, hygiene practices and ongoing field monitoring. Trans Mountain conducts ongoing monitoring for compliance of all measures to ensure they are diligently enforced. All efforts in this regard have been consistent, industry-leading and communicated to workers, contractors, and communities.

Trans Mountain is constantly monitoring the guidelines from health officials. Trans Mountain updates COVID-19 plans and procedures as needed to ensure current practices and requirements are being implemented and followed. Trans Mountain will implement the most stringent guidelines as its standard practice. Some of the specific measures implemented include:

- Enhanced cleaning and sanitization protocols and increased availability of sanitation supplies.
- Practices that ensure physical distancing guidelines between workers.
- Workforce location management; including offices and field locations.
- Restricted access measures at worksites and offices to ensure a safe workplace.
- Limited in-person meetings.
- Alternate mustering of field workforce from home or remote work locations to minimize interaction with coworkers.
- Staggered lunch and coffee breaks to minimize number of people gathering.

- Staggered work shifts to minimize the number of people on any given site including adhering to the recommendations being provided by health authorities.
- Limiting travel for execution, supervision or inspection of work.
- Special close proximity procedures including additional hygiene and the use of PPE for working in close proximity with others when physical distancing cannot be maintained.
- Health screening for entry to job sites including health declaration checklists and temperature testing.
- Careful management of phased office re-population, with appropriate measures to adhere to COVID-19 protocols.
- Maintaining the ability to rapidly respond to any infection encountered in office re-population and pulling back office migration is warranted.
- Maintaining work at home practices for workforce not yet able to return to office.

A significant number of Trans Mountain's Expansion Project workforce is employed directly through its General Construction Contractors (GCC) and Engineering Procurement and Construction Contractors (EPC) (together the "contractors"), therefore protocols have been implemented to ensure both the Company and its contractors are creating and maintaining a safe working environment. Trans Mountain requires confirmation from contractors that all Trans Mountain requirements are being met through daily reporting. Trans Mountain reviews these reports to ensure compliance and tracks them for overall workforce availability and health.

Communities, both Indigenous and non-Indigenous, are relying on Trans Mountain to provide safe work and employment opportunities. Economic recovery relies on the approximate 5,000 direct jobs that Trans Mountain and the Expansion Project bring, while continuing to reliably deliver petroleum to the Pacific Northwest. As such Trans Mountain has considered the risks to Indigenous and local communities in its planning and execution, and continues to engage, communicate and work with these communities to address their concerns.

In addition, extensive effort has been taken at each construction site to reinforce attention to safety as workers may be under experiencing some anxiety during construction work due to COVID-19 situation. Daily monitoring of site workers availability and health status regarding the COVID-19 like symptoms is occurring across the operation and Project. Several contractors have added qualified nurses in the field for monitoring body temperature of those entering the worksites to ensure "fit-for-duty." TMEP Health and Safety field inspectors are actively monitoring and reporting on physical distancing and other COVID-19 response requirements by contractors.

This report summarizes the implementation of COVID-19 protocols and current work activities being undertaken by Trans Mountain. This is an ever-changing and dynamic situation; Trans Mountain continues to implement guidelines and best practices as they become known and provided. This report demonstrates that all necessary measures are being taken and that the Company is well positioned to continue construction and operations.

# TABLE OF CONTENTS

1	Exe	ecutive Summary	1	
2	Situ	Situation Summary5		
	2.1	Emergency Management	5	
	2.2	Workforce Plan	7	
	2.3	Engagement	10	
	2.3.	3.1 Associations and Industry Engagement	10	
	2.3.	3.2 Coordination with Health Authorities	10	
	2.3.	3.3 Expert Opinion	11	
	2.4	Indigenous Advisory and Monitoring Committee (IAMC)	12	
	2.4.	4.1 Emergency Management Working Group	12	
	2.4.	Policy Working Group – Indigenous Monitoring	12	
	2.4.	1.3 IAMC Socio-Economic Sub-committee	14	
	2.4.	1.4 IAMC COVID-19 Task Group	15	
3	Reg	gulatory Oversight	18	
	3.1	Legislation	18	
	3.2	Compliance	19	
4	Trar	ans Mountain and TMEP COVID-19 Response	21	
	4.1	General Requirements	22	
	4.1.	I.1         Before Being Permitted on TMEP Worksites	23	
	4.1.	1.2 Physical Distancing	24	
	4.1.	1.3 Cleaning	25	
	4.1.	1.4 Personal Hygiene		
			26	
	4.1.	1.5 Additional Protocols		
	4.1. 4.1.		26	
			26 26	
	4.1.	1.6 Personal Protective Equipment (PPE)	26 26 28	
	4.1. 4.2	1.6 Personal Protective Equipment (PPE) Contractor Management Training	26 26 28 28	
	4.1. 4.2 4.3	1.6 Personal Protective Equipment (PPE) Contractor Management Training	26 26 28 28 29	
	4.1. 4.2 4.3 4.3.	<ul> <li>Personal Protective Equipment (PPE)</li> <li>Contractor Management</li> <li>Training</li> <li>Contractor Orientations</li> <li>Workforce Exposure, Self-Isolation and Contact Tracing</li> </ul>	26 26 28 28 29 29	

	4.4.	3	Return to Work
	4.4.4	4	COVID-19 Field Testing
4	.5	On-S	Site Construction Security
4	.6	Add	itional Measures Specific to Indigenous Peoples33
	4.6.	1	Indigenous Worker Personal Safety and Prevention Measures
	4.6.	2	Indigenous Worker Health Monitoring and Reporting
	4.6.	3	COVID-19 Related Information Disclosure
	4.6.4	4	Enhanced Indigenous Engagement Measures
4	.7	Indi	genous Monitoring Program
4.8 Indigenous Engagement COVID-19		Indi	genous Engagement COVID-19
	4.8.	1	Engagement Activities
	4.8.	2	Email to Indigenous Groups with Commercial Agreements41
	4.8.	3	Additional Engagement with Indigenous Groups41
4	.9	Com	munity and Landowner
4	.10	Wor	ker Accommodation42
	4.10	).1	Indigenous Accommodation Measures46
	4.10	).2	Contact Information
4	.11	Com	munications46
	4.11	1	Internal Communications47
	4.11	2	External Communications
5	Арр	endic	es51

# 2 SITUATION SUMMARY

On March 19, 2020, the World Health Organization (WHO) declared that COVID-19 was a pandemic affecting the world in unprecedented ways. Prior to this announcement, Public Health Agencies across Canada were preparing for the pandemic and establishing response measures based on the latest science and the evolving situation. Health authorities and regulatory agencies have provided continually developing guidance to all Canadians as it relates to physical distancing, safe working environments, hygiene, cleaning of surfaces and wearing masks or face coverings.

As Trans Mountain operations have been declared an "essential" service and construction of the Expansion Project is an "approved industrial project", Trans Mountain has developed actions and protocols to ensure operations and construction are occurring safely and are consistent with industry, federal, provincial and community rules and recommendations. Such safe practices continue to evolve reflecting changes in available equipment and changes in virus status and will continue to evolve as Canada returns to normality post virus.

Alberta and British Columbia now have readily available public health COVID-19 testing for anyone showing symptoms and thus far Trans Mountain workers and contractors who have taken a test have been able to demonstrate medical clearance to return to work. To date, TMEP contractors have had nine confirmed positive cases of COVID-19. One located in the Edmonton area, Spread 1, and the remainder in the Lower Mainland. Contact tracing is conducted for each positive case and any close contacts are required to execute a period of isolation as directed by the jurisdictional health authority. Prior to return to work, the worker must be assessed for fit-for-duty by a TMEP Medical Doctor. To date, one of these nine cases referenced above were of Trans Mountain Operations and the remainder are from TMEP.

## 2.1 EMERGENCY MANAGEMENT

Trans Mountain is committed to public safety, protection of the environment and operation of its facilities in compliance with all applicable rules and regulations. As a company regulated by the Canada Energy Regulator (CER), Trans Mountain has an Emergency Management (EM) Program that anticipates, prevents, manages and mitigates conditions during the unlikely event of an emergency. The Emergency Management Program is also responsible for Business Continuity Planning which includes Crisis Response and pandemic planning.

The Crisis Management Plan (CMP) provides a framework to manage a wide range of crises, from operations-based incidents to business disruptions. The CMP is intended to provide flexible solutions to a variety of crisis scenarios which lends support to detailed response procedures such as those found in the Emergency Response Plans for spills or fires. The Pandemic Plan supports the CMP and serves to minimize impacts to workers or contractors from illness and reduce risks to critical business functions. Pandemic planning assumptions and recommendations have been included for business continuity planning. Employers play a key role in protecting their workforce's health and safety during pandemics. Trans Mountain is a critical infrastructure operator and has planned for continued operation and response capabilities during all types of crisis, including a pandemic.

Trans Mountain stood up its Corporate Incident Support Team (CIST) in January 2020 in anticipation of impacts from the COVID-19 crisis and began planning and implementation of its over-arching Pandemic Plan to be more responsive to changes in the crisis and eventual declaration of a worldwide pandemic. Trans Mountain commenced communications about COVID-19 to its workforce on January 31, 2020; and communications are ongoing. The Pandemic Plan was officially implemented on February 27, 2020.

Trans Mountain defined objectives for its COVID-19 Response to ensure it was considering the important and unique nature of the Company's operations and the Expansion Project, as well as key stakeholders. Trans Mountain's objectives are and continue to be:

- 1. Maintain a safe work environment and ensure business continuity.
- Ensure continued safe operation of the existing pipeline system, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities and the communities affected by Trans Mountain's operations.
- 3. Ensure continued safe operation of the pipeline system.
- 4. Ensure continued safe construction of Trans Mountain Expansion Project.

A summary of actions and timelines is provided in Appendix A: COVID-19 Response Timeline.

Trans Mountain is taking primary guidance from the health agencies with jurisdiction over the areas in which it is operating and constructing. It is also monitoring and responding to recommendations from leading agencies including the United States Centre for Disease Control (USCDC) and World Health Organization (WHO).

The CIST meets to review and respond to the changing environment and initiates actions necessary to meet the response objectives. The health and safety task force, a sub-committee of CIST, works to maintain, develop, and implement necessary policies and procedures required to ensure workplace safety. Members of CIST are responsible for communications with stakeholders. CIST meetings occur once per week as the situation became more stable but will increase frequency as needed.

CIST provides constant updates to internal audiences through several channels including – regular "allhands" meetings with President and CEO, weekly updates to the Senior Management Committee, an intranet COVID-19 page (primary source of documentation and updates for the workforce), existing structure for frequent operations and health and safety meetings, broadcast emails, regular field safety meetings, signage/posters, pre-job safety meetings, health & safety bulletins, and oversight by field safety inspectors. Trans Mountain has a Board of Directors sub-committee whose focus is COVID-19. The committee meets at least bi-monthly to review Trans Mountain' COVID-19 approach, decisions and plans.

Emergency Preparedness planning continues through COVID-19. Trans Mountain has successfully held 16 exercises in 2020 and has a further 14 planned for the remainder of the year.

While Trans Mountain will continue to exercise its regular emergency response plans throughout 2020, it will do so in a manner that ensures the health and safety of all attendees and reduces the potential for virus transmission. Trans Mountain Emergency Management strives to include observers in its exercises whenever possible. However, the current situation with COVID-19 makes the Observer Program

inappropriate. Trans Mountain anticipates its Observer Programs will continue in the future and will remain a core component of the Training & Exercise Program and will reintroduce it as soon as it is deemed appropriate.

To date, Trans Mountain has completed four spill response exercises involving both land a river-based environment, seven fire equipment exercises at our terminals and five 5 tabletop exercises (fire and spill scenarios) while adhering to COVID-19 Protocols.

# 2.2 WORKFORCE PLAN

On March 12, 2020, the Corporate Incident Support Team identified that continued worker safety and ensuring business continuity for Trans Mountain would be to implement a widespread work-from-home strategy. It was identified that the business would be in a better position to ensure the continued safe operation of the pipeline system and continued safe construction of Trans Mountain Expansion Project if all office workers worked remotely.

The decision to relocate was put into effect on March 15, 2020 and included the entire Trans Mountain workforce who normally work in office environments. Exceptions were made for some workers whose job function could not be performed from home including the Control Centre, mail room, reception and IT service desk.

By March 19, 2020, Trans Mountain had implemented its remote work plan that transitioned officebased workforce to either home offices or remote worksites with full support for working alone and updated guidance on safety at home, including ergonomics. Figure 1 summarizes the work status as if October 1, 2020.



Figure 1: Work Status at TM as of October 1, 2020

The return-to-office will be a phased approach based on business need, personal limitations, and public health direction. Phase 1 began July 6, 2020 and included Directors and above and those individuals who believed they would be more effective working from the office up to a maximum capacity of 30 per cent. Office occupancy on July 6, 2020 as a percentage of normal:

- Calgary 23%
- TMEP Burnaby 35%
- All other locations 25%-35%

Trans Mountain is expanding the Calgary return of workers to the office in October up to about fifty to sixty percent. Trans Mountain has developed a return-to-office plan that includes enhanced safety protocols for all office locations including:

- Health declaration is required by all workers returning to the office and use of internal selfreporting application for status reporting.
- Registration of all personnel in the office is required daily, to aid in rapid contact tracing.
- Rapid response plan is in place for contact tracing.
- Requiring the use of non-medical masks for use when physical distancing (>2m) is not possible such as in elevators, kitchens and other common areas.
- High touch areas are frequently sanitized (printers, kitchens, doorways, door handles, meeting rooms and entry doors).
- Additional office controls in place include floor markings to remind of physical distancing, poster reminders of hand hygiene and physical distancing requirements, use of hand sanitizer and sanitization wipes for workspace cleaning.
- Mandatory computer-based COVID-19 training.

Further return-to-office planning in the fall will be coordinated by Senior Management with provincial pandemic guidance.

Trans Mountain continues tracking the health of its workforce throughout the COVID-19 crisis using an internal digital reporting tool. This tool is a self-service portal accessed via the intranet site for the workforce to report its health status. The extended workforce (construction contractors and sub-contractors) is tracked by the contracting company and reported to Trans Mountain supervisors on a daily basis to monitor the wider workforce availability and health. Figure 2 and 3 displays recent weekly





Figure 2: Trans Mountain Illness/Isolation Trending



Figure 3: Contractor Isolation Tracking. Note: A report of "0" is not represented other than to indicate a company that previously had people in isolation now has "0" workers in isolation.

Physical distancing, health screening, additional hygiene measures, and use of personal protection equipment (PPE) have been implemented to ensure ongoing operation and maintenance of the existing Trans Mountain Pipeline system continues safely and without interruption. To ensure safe operation of the pipeline system, certain operations and maintenance work must continue (e.g., critical pipeline integrity digs). The Company has postponed some non-essential work to reduce the number of work crews in communities.

All protocols and processes outlined in this document have been implemented by the Trans Mountain Expansion Project for each Project work site.

# 2.3 ENGAGEMENT

# 2.3.1 Associations and Industry Engagement

Trans Mountain is a member of several organizations and associations. Trans Mountain is participating in COVID-19 industry forums during the pandemic to share information, check procedure, and compare leading practices through regular contact with the agencies and their members. The following is a list of these agencies:

- CEPA Emergency Management, health and safety, control room management communities of practice. The Executive Operations Standing Committee. Emergency Management holds a biweekly call for information sharing and questions.
- AOPL-API as-needed coordination calls for COVID-19 response.
- Port Metro Vancouver ad hoc coordination and sharing of health and safety measures.
- BC Chamber of Shipping regular calls for COVID-19 updates.
- Association of Consulting Engineers Canada BC chapter.
- Canadian Construction Association review for concordance with its COVID-19 guidance document.
- Construction Owner Association of Alberta ongoing best practices webinars.
- National Fire Protection Association (NFPA) reviewing guidance materials being produced.
- International Association of Emergency Managers (IAEM) reviewing guidance materials being provided to members.
- BC Government Provincial Regional Operations Centres Coordination Calls attendance at coordination calls as scheduled to gather information from Health Authorities.
- Critical Infrastructure Alberta attendance at coordination calls for information sharing and asking questions of the government as scheduled.
- Individual companies with camps (including BC Hydro and Oil Sands Community Alliance) and/or essential service construction projects underway.
- Trade Unions and CLAC leadership review comfort and confidence as worker safety measures.

# 2.3.2 Coordination with Health Authorities

Coordination with the health authorities, including the BC First Nations Health Authority by Trans Mountain has been on-going since February 2020, when pre-planning for the COVID-19 pandemic commenced. Coordination calls, organized by Emergency Management BC and led by the respective health authority; Interior Health, Fraser Health and Vancouver Coastal Health are now taking place as needed when there are changes in public health policy. In March and early April 2020, the call took place multiple times per week. Trans Mountain has attended every one of these calls. Participants include provincial ministries, Indigenous community leaders, local government and critical infrastructure operators, such as Trans Mountain. The BC First Nations Health Authority has been a speaker on these calls. Trans Mountain receives updates from Indigenous Services Canada BC Region. This information is then shared with the respective community contacts as needed By being a regular and consistent attendee on these calls, Trans Mountain has been able to immediately implement the guidelines, practices, and health orders to ensure the health and safety of our workforce, their families and our neighbouring communities. It has also provided awareness of how Indigenous communities are planning and responding to the pandemic and the resources available to support their communities.

Trans Mountain and health authorities in BC and Alberta have a pre-established relationship. Health authorities have participated in Trans Mountain's full-scale exercises in the past:

- 2018 Alberta Health participated in the Jasper full scale exercise participating in the Environment Unit; after the exercise a number of meetings were held to further refine Trans Mountain's public protection plans specifically related to air monitoring.
- 2018 Fraser Health and Vancouver Coastal Health were members of the Environment Unit at the Westridge Marine Terminal exercise, preparing an incident specific air monitoring plan.
- 2019 Northern Health Authority participated in the full-scale exercise in Valemount, BC, observing the deployment, touring the Incident Command Post (ICP) and confirming the role it would have in an incident in that area of the province.
- 2020 Interior Health participated in the Liaison Section of the ICP established for the full-scale exercise in Kamloops.

Though invited to the exercises described above, the BC First Nations Health Authority was unable to attend.

These relationships developed through collaboration, consultation, and exercising emergency plans and processes have supported the ability for Trans Mountain to promptly and effectively prepare and respond to the pandemic.

#### 2.3.3 Expert Opinion

Trans Mountain has retained a Medical Doctor to aid in the development, implementation, and review of COVID-19 response plans and procedures, as well as to provide advice related to ongoing questions as they arise from Trans Mountain.

The medical doctor is familiar with industrial practices and infectious diseases and is an expert resource with experience providing similar advice to other construction projects across Canada; including those with camp communities. The medical doctor also provides, verbally and in writing where needed, proactive information and literature based on emerging information so TMEP can adapt and modify its plans accordingly,

The doctor is currently completing an assessment of medical plans across the Project; including COVID-19 measures. The assessment will evaluate contractor plans and the overall TMEP approach and identify potential weaknesses and opportunities related to remote areas, emergencies, urgent care and issues related to camp operations and preparedness. Where necessary, Trans Mountain has the medical doctor conduct return-to-work evaluations of positive cases of COVID-19, or presumptive cases that result due to close contact with a positive COVID-19 case in the field work environment, immediately prior to the conclusion of the isolation period or as per the jurisdictional health authority. This measure ensures fitness-for-duty.

# 2.4 INDIGENOUS ADVISORY AND MONITORING COMMITTEE (IAMC)

Trans Mountain has met regularly with and shared COVID-19 information with the IAMC and its subcommittees. The committee's mandate to monitor and advise the CER regarding Trans Mountain operation and expansion construction is an important contribution to the trusted communication between Indigenous communities, the Company and the regulator. The Company has met with the following sub-committees in addition to regular meetings with the full IAMC.

# 2.4.1 Emergency Management Working Group

At a meeting on April 22, 2020, Trans Mountain participated in the following discussion topics:

- Plans to continue to exercise its Emergency Management Plans on a regular basis, however due to COVID-19, exercises will not include an observer program. Trans Mountain's Observer Program, to which IAMC had been a participant, has been suspended until 2021.
- Specific to its emergency response capacity, Trans Mountain will remain fully able to respond to an emergency during any conditions, even during COVID-19.
- Indigenous workers on construction activities, shared with the IAMC information regarding Tran Mountain's COVID-19 extra precautions.
- IAMC questioned Trans Mountain's practice would be when a community goes into lockdown, or if workers are sent home from the worksite. The group discussed a potential half-day video conference to explore this topic further.

The meeting occurred on May 7, 2020 and no specific COVID-19 topics were discussed. All COVID-19 related matters are now addressed through the IAMC COVID-19 Task Group meetings. This is further described in section 2.4.4.

# 2.4.2 Policy Working Group – Indigenous Monitoring

The Policy Working Group has met regularly since October 2019. While its work predominantly focuses on the topic of Indigenous Monitoring (IM), numerous meetings have taken place since mid-March 2020, where the topic of Trans Mountain's COVID-19 response has been raised. Topics discussed related to COVID-19 include:

- In a small group call on March 19, 2020, the group recommended that, as a next step, the Policy Table dedicate significant time to discuss specific questions relating to COVID-19 management over its next series of meetings.
- At the March 19, 2020 meeting, each party provided a brief update on recent COVID-19 implications including the shift to working from home and implementation of travel and inperson meeting restrictions. Trans Mountain provided the following information:
  - New work from home measures Trans Mountain implemented at all office locations.
  - Physical distancing measures being implemented at all work sites.
- On the March 27, 2020 call, the CER communicated it had enacted its business continuity plan and is prioritizing tiers of work: staff health and safety, emergency response and key regulatory

decisions. The CER remains committed to the work of the Policy Table and wants to adapt work appropriately to demonstrate leadership. Trans Mountain focused on workforce safety; Project activities continue under specific protocols as per federal and provincial guidelines (e.g. no nonessential workers, staggering shifts/breaks, minimizing in-person meetings, enhanced cleaning, and physical distancing). Indigenous communities were in various states of shut-down and emergency response. Many non-essential workers were not working or working from home; others (in some case Indigenous Monitors) are repurposed to emergency response. Many communities are facing financial challenges.

Participants on the March 27, 2020 call then discussed how the pandemic is impacting their operational work and respective IM programs.

- CER responded that operationally, is balancing directions from government and health officials with providing ongoing oversight of construction projects. Currently, CER is adjusting risk modelling to reassess which construction activities require in-person oversight/activities and which can be overseen with alternatives (i.e. information exchange meetings, implementation assessments, audits, etc.). CER is also looking at how to protect staff with appropriate PPE and protocols (i.e., local travel only). There are no in-person activities currently scheduled for the next two to three weeks; however, there could be in-person activity in the next three months. Participants identified the Indigenous Monitoring Sub-committee as the appropriate venue to discuss Indigenous/IAMC participation in compliance with verification planning.
- Trans Mountain is continuing with environmental inspections and the TMEP IM Program. It has increased inspection presence and integrated COVID-19 protocols into inspections. The Company is reallocating resources to respond to shifts in CER oversight (i.e. more people, time required for audits, information exchange meetings). Trans Mountain is currently developing a roster of additional inspectors and monitors in case people choose not to work and is moving to training and on-boarding people online. It is seeking opportunities to go above and beyond provincial/federal protocols to increase safety of workers.
- The Indigenous Caucus registered its interest in continuing robust oversight to enhance confidence in the Project. In the IAMC IM Program, the IAMC will determine how to balance safety of IMs with providing opportunities for Indigenous participation in oversight. Partners may face capacity challenges (e.g. logistics and scheduling) during the pandemic period.

At the March 27, 2020 meeting, Trans Mountain provided the following COVID-19 specific update:

- TMEP response plan, contractors work site specific plans, and additional business continuity plans also in place.
- Self-isolation if symptoms arise, after coming home from vacation or after interaction with someone.
- Work from home wherever possible (including some field workers).
- Restricted access at control centres.
- Non-essential travel is not allowed.
- Staggering work shifts, lunch breaks, etc.
- Enhanced sanitation and cleaning measures (including offices, trailers, shuttle vehicles, etc.).

- Physical distancing requirements (including vehicles, etc.).
- Elimination of in-person meetings and minimizing the number of people for in-person meetings when required (e.g., tailgates).
- Exploring temperature testing.
- Self-declaration forms required.
- Added shuttle buses to enable workers to physical distance.
- PPE cleaning.
- Communication regarding protocols and measures the workforce need to implement

On the April 3, 2020 call Trans Mountain discussed the sample three-week look-ahead schedule as an example of a potential future communication. Trans Mountain also provided a COVID-19 update including changes to worker transport, shift alterations, staggered lunches, PPE requirements, physical distancing etc. Trans Mountain re-emphasized the COVID-19 protocols shared at the March 27, 2020 meeting and referenced an online COVID-19 resource for its contractors; including updated COVID-19 measures are shared internally on Trans Mountain's intranet, communicated via email, and externally on its website and in discussions with communities and agencies, etc.

On the April 17, 2020 conference call, a portion of the meeting focused on COVID-19. Trans Mountain re-emphasized the COVID-19 messages including:

- Temperature monitoring now in place at all sites.
- Safe work practice developed for work that must be in close contact and where physical distancing is not possible.
- TMEP has masks for crews for this work and others as required.
- No reported cases of infection for Project or Company.
- Focus on prevention: questionnaire, temperature, self-isolation.
- TMEP had a WorkSafeBC inspection focus on COVID-19 with no findings.
- CER advised it was looking at getting inspectors back out in the field.
- Trans Mountain provided a construction schedule update.
- In advance of the meeting, Trans Mountain shared links to its website to get area-specific construction updates and how to register to receive ongoing updates.
- Trans Mountain shared that GCCs are providing 44-person capacity buses however only load seven workers to ensure physical distancing. Trans Mountain has reduced non-essential workers from work sites and allowed them to work at home (i.e., administration and document control). Trans Mountain discussed its process when a worker is exposed to someone else that has symptoms or suspects they may have come in contact with someone with symptoms, including 14-day paid isolation and testing.

During July 2020, the Indigenous Monitoring Manual was updated with specific references to COVID-19 and any associated topics.

## 2.4.3 IAMC Socio-Economic Sub-committee

At a meeting on April 2, 2020 Trans Mountain shared information on its COVID-19 response, including specific measures being taken:

- Staggering work shifts to minimize number of people on any given site including adhering to the recommendations being provided by health authorities.
- Following physical distancing guidelines between workers on-site and in site offices.
- Staggering lunch and coffee breaks to minimize number of people gathering.
- Minimizing or eliminating in-person meetings, holding necessary meetings outside, in smaller groups or via technology.
- Enhancing cleaning and sanitization protocols and increased availability of sanitation supplies.
- Increasing bus, vehicle and trailer cleaning requirements and frequency and reducing the number of people being transported per vehicle to adhere to health authority recommendations.
- Ensuring workers orientation includes COVID-19 expectations, awareness and prevention.
- Ensuring non-essential workforce members are not entering any of our worksites or offices.
- Ensuring all individuals have access to appropriate safety equipment, understanding the expectation of personal hygiene.
- Checking people entering the sites for fever or sickness.
- Using Health and Safety workers to monitor implementation of COVID-19 response guidelines on site.
- self-declaration forms required for all, prior to entering any work site.

On April 30, 2020, as part of our ongoing commitment to safety and emergency preparedness Trans Mountain completed an annual review of its Emergency Response Plans (ERP) for the Trans Mountain Pipeline, Terminals and Tank Farms, and Westridge Marine Terminal. The plans were submitted to the Canada Energy Regulator (CER), to the BC Oil and Gas Commission (OGC) and to the IAMC.

Meetings occurred on May 5, 2020. The Trans Mountain COVID-19 Report was discussed as to whether or not this report had been shared with members of the IAMC sub-committees. All COVID-19 related matters are now addressed through the IAMC COVID-19 Task Group meetings. This is further described in section 2.4.4.

## 2.4.4 IAMC COVID-19 Task Group

On May 1, 2020, the Natural Resources Canada Deputy Minister convened a dialogue between leadership of the Indigenous Caucus of the IAMC-TMX, Trans Mountain Corporation, Canada Energy Regulator, and Fisheries and Oceans Canada to understand, assess, and identify next steps to address concerns related to the Trans Mountain Expansion Project construction during the COVID-19 pandemic. The parties have convened a COVID-19-specific Task Group that includes the IAMC comprising representatives from the Indigenous Caucus, CER, Fisheries and Oceans Canada (DFO) and Trans Mountain.

The COVID-19 Task Group identified the following two streams of work:

- 1. Stream A: Trans Mountain Health and Safety Plan Requirements and Reviews, includes the following tasks:
  - Task 1: Confirm understanding of health and safety regulatory regime and existing directives/standards/guidelines.

- Task 2: Review Trans Mountain COVID-19 measures and plans.
- Task 3: Identify and discuss opportunities to collaborate to address residual and unique risks to Indigenous communities.
- 2. Stream B: Return to On-site Indigenous Monitoring and Oversight of OHS Performance, includes the following tasks:
  - Task 1: Collaboratively planning compliance verification activities.
  - Task 2: Developing safe work procedures for IAMC Indigenous Monitors that align with regulator and company OHS plans.

Trans Mountain participates in the IAMC COVID-19 Task Group to collectively identify and address the presence of the TMEP in proximity to Indigenous communities and as a project employing Indigenous workers. An objective of Trans Mountain's participation is to hear IAMC concerns, feedback and suggestions. IAMC COVID-19 Task Group members have also sought clarity on:

- why Trans Mountain contact traces and how;
- how and when Public Health authorities are contacted about a presumptive case at Trans Mountain;
- how Trans Mountain ensures worker adherence to policies and requirements;
- standards related to mask use and supply;
- general Construction Contractor's COVID-19 management programs; and
- protecting individual confidentiality.

The IAMC COVID-19 Task Group meets regularly. The first meeting occurred on May 20, 2020 where discussions took place regarding objectives of the task force, priorities and timelines. A draft scoping document was presented for discussion.

On June 3, 2020 the IAMC COVID-19 Task Group met with the CER and Trans Mountain provided updates on the progress made regarding Version 3 of IAMC COVID-19 Scoping Document dated May 21, 2020 and identified proposed next steps.

On June 15, 2020 Trans Mountain provided its response to the following questions posed in Version 3 of IAMC COVID-19 Scoping Document dated May 21, 2020:

- What measures does Trans Mountain currently have in place? What, in detail, has Trans Mountain implemented with respect to physical distancing, on-site testing, personal protective equipment, worker accommodation and scheduling, construction and operation of work camps, self-isolation protocols or resources for workers before entering sites or returning home to communities, guidance and resources for workers, notification protocols for confirmed cases, and briefing Indigenous Leadership on COVID-19 measures?
- 2. Trans Mountain's COVID-19 response document which outlines measures specific to Indigenous communities.
- 3. Trans Mountain's role and interfaces with health regulators and authorities.

- 4. Provide a description of what the effect has been from COVID-19 on Trans Mountain's Indigenous Monitoring Program.
- 5. Explain the effect of COVID-19 on Trans Mountain's Emergency Management Program? For example, what measures are being taken to protect the health and safety of workers, emergency responders, and Indigenous communities during a spill or emergency? What effect will the pandemic have on Trans Mountain's ability to respond quickly to a spill or emergency? How will Indigenous communities be notified in the event of a spill or other emergency if offices are closed?
- 6. What analysis has been conducted of any incremental risks posed to Indigenous communities from construction activity (e.g., worker movements or proposed camp workforce by general contractors) and how will these risks be mitigated?

On July 16, 2020 the IAMC COVID-19 Task Group met and the CER and Trans Mountain provided updates on progress made regarding Version 5 of IAMC COVID-19 Scoping Document dated June 16, 2020 and identified proposed next steps. The groups also reviewed a Draft Proposed Schedule (Version 1, dated July 9, 2020) that identified both the IAMC Monitoring Policy Table and COVID-19 Task Group meetings to the end of September 2020.

On July 30, 2020, the IAMC-TM COVID Task Group met and were provided with updates from the CER and Trans Mountain on progress made regarding Version 6 of IAMC COVID-19 Scoping Document dated July 10, 2020 and identified proposed next steps.

On August 20, 2020 Trans Mountain met with the IAMC COVID-19 Task Group. Topics discussed at the meeting included:

- Trans Mountain shared a draft flow chart depicting who would be notified in the event of a positive COVID-19 case at a Trans Mountain work site or camp, and then walked the Task Group through the notification protocol using hypothetical scenarios.
- In the event of a positive COVID-19 case, Trans Mountain's Indigenous Relations team has committed to notifying the IAMC within 24 hours of confirmation.
- Trans Mountain shared that additional information regarding notification protocols is available within its publicly available Report on COVID-19 Preparedness and Planning.
- The IAMC COVID-19 Task Group and the IAMC Indigenous Caucus indicated an interest in working with Trans Mountain to help community leadership and the IAMC Indigenous Monitors have access to timely and accurate information so communities and Monitors can respond appropriately and have confidence in processes.
- The newly released Interim Guidance Document for COVID-19 Prevention and Control from the Canadian Energy Pipeline Association (CEPA) Foundation was mentioned and a discussion of the guidance document to be added to the agenda for the September 3, 2020 meeting.
- Regulators on the COVID-19 Task Group, shared that they have health and safety protocols in place for visiting Trans Mountain sites to ensure the protection of their staff and Trans Mountain workers and contractors. One regulator continues to limit external meetings, though it has resumed site visits, where necessary.

On September 3, 2020 Trans Mountain met with the IAMC COVID-19 Task Group. Topics discussed at the meeting included:

 Natural Resources Canada to follow-up regarding the role of the Public Health Agency of Canada in overseeing or managing COVID-19 response as it relates to Trans Mountain and provide a brief update at the next meeting.

# **3** REGULATORY OVERSIGHT

## 3.1 LEGISLATION

Both the federal and provincial governments have a role in overseeing and regulating Occupational Health and Safety (OHS) at Trans Mountain's work sites. As a federally-regulated pipeline, the CER has jurisdiction over all construction and operation activities, pursuant to the Canadian Energy Regulator Act, including harm prevention obligations. The CER's Onshore Pipeline Regulations (OPR) require companies to manage hazards and their effects of workers and the public in a proactive and ongoing manner and require companies to be compliant with all OHS legal requirements, including any requirements related to COVID-19. The CER's OPR require companies to manage hazards and their effects of workers and the public in a proactive and ongoing manner and requires companies to be compliant with all OHS legal requirements, including any requirements related to COVID-19. The CER is also responsible for enforcing the Canada Labour Code, applicable to federally-regulated workers, including employees of Trans Mountain. While contractors and sub-contractors fall under provincial jurisdiction and the purview of the provincial worker safety agencies in BC and AB, the CER also provides oversight to these contractors through enforcement of Trans Mountain's contractor management and quality assurance programs. The CER has cooperation agreements in place with both WorkSafe BC and the Alberta Ministry of Labour to coordinate and harmonize inspection of TMEP work. On September 29, 2020, the CER released a requirement for reporting of confirmed positive cases of COVID-19 at CER regulated worksites. The required information must be provided to the CER via email within 48 hours of the company being made aware of a positive case.

The Province of British Columbia has determined that construction, including industrial construction, is an essential service in BC. Under the BC Public Health Act, the provincial health officer (PHO) has the authority to issue directives regarding the safe operation of construction sites and work camps. These directives are enforced by WorkSafe BC in compliance with the Workers Compensation Act and associated OHS Regulation.

The operation of an industrial camp is prescribed as a regulated activity under BC's Public Health Act. A camp operator must comply with the requirements of the Industrial Camps Regulation, which outlines the requirements for a number of public health-related factors, including camp siting, size, facilities, water, and sanitation. BC has issued guidance to construction sites and camps operating during COVID-

19 that includes specific measures required to minimize the risks of COVID-19 transmission and illness to their workforce. On April 23, 2020, the BC Provincial Health Officer issued an order with respect to camps that places certain requirements on employers, operators, coordinators and workers. This order has been incorporated by Trans Mountain in its Valemount Camp and as planning for operations of its additional camp communities continue to progress.

In Alberta, the government has determined that construction related to energy infrastructure is an essential service. The Government of Alberta has issued Guidance for Workplaces that identify many of the same measures as BC. Occupational Health and Safety (OHS) is enforced in Alberta under the OHS Act, Regulation and Code, and enforced by Alberta OHS.

## 3.2 COMPLIANCE

Given their authority, WorkSafe BC, Alberta OHS and the CER routinely conduct inspections and other compliance verification activities. These inspections and reviews continue during the COVID-19 pandemic. The CER routinely conducts inspections of regulated sites with respect to worker health and safety. The CER continues to conduct compliance verification activities through inspections, additional means of reporting to the CER, additional virtual meetings and program reviews.

The CER is also responsible for ensuring Trans Mountain complies with legally binding certificate conditions, including the requirement that Trans Mountain develop and implement a Worker Accommodation Strategy and a Health and Safety Management Plan for the Expansion Project. Trans Mountain continues to make condition compliance submissions to the CER and the CER proceeds to review and accept submissions. Trans Mountain regularly engages with these agencies. A summary of interactions during COVID-19 is provided in Table 1.

Lead Regulatory Compliance during COVID-19			
Agency	Interaction	Compliance Activities	
WorkSafe BC	<ul> <li>Met to provide open lines of communication, provide an overview of Trans Mountain response, seek feedback on same, including any perceived gaps and areas particular concern, and to stay abreast of developing requirements.</li> <li>Continue to meet to provide updates on Trans Mountain status and programs.</li> </ul>	<ol> <li>The following inspections have taken place:         <ol> <li>April 3, 2020 - Inspection Report #202017819037A - No non-compliances noted. Worksafe BC made four recommendations for improvement which have been implemented at site.</li> <li>April 26, 2019 – no official report issued at time of this report. Worksafe BC initial feedback expressed their satisfaction on COVID-19 safety measures.</li> <li>July 22, - Conducted a Lower Mainland inspection in conjunction with CER. No findings identified.</li> </ol> </li> </ol>	
Alberta OHS	<ul> <li>Met to provide open lines of communication, provide an overview of Trans Mountain response, seek feedback on same, including any perceived gaps and areas particular</li> </ul>	OHS conducted an inspection with a Trans Mountain contractor regarding cleaning procedures; there were no findings or follow-up.	

Lead Regulatory Compliance during COVID-19		
Agency	Interaction	Compliance Activities
	<ul> <li>concern, and to stay abreast of developing requirements.</li> <li>Continue to meet to provide updates on Trans Mountain status and programs.</li> </ul>	
CER and Other Regulators	Two calls per week that provide opportunity for discussion about COVID-19, condition compliance and field activities.	<ul> <li>Contractor Oversight Audit concluded.</li> <li>DFO monthly inspection at Westridge continues as a desktop exercise. This inspection includes IAMC.</li> <li>On April 24, 2020 TMEP had a BC EAO officer inspect the Kingsvale Transmission line ROW related to environmental concerns. There were no findings or follow up as a result of this inspection and the inspector followed all the Trans Mountain COVID-19 protocols and expectations on physical distancing that are in place.</li> <li>On May 21,2020 CER conducted an in-person inspection at Burnaby Terminal and associated temporary sites. No immediate findings have been identified. COVID-19 protocols were adhered to.</li> <li>June 24-25, 2020 – BC EAO conducted field inspections at facilities from Hope to Burnaby. No findings were identified.</li> <li>July 2 – 4 – Valemount Camp. No findings associated with COVID-19</li> <li>July 14 - 16 – Spread 2. Non-compliances received related to COVID-19. Corrective Action plan has been developed and submitted to the CER</li> <li>July 12 – 24 – Lower Mainland. Identified non-compliances with Trans Mountain COVID-19 Plans. TMEP has developed corrective action plans and submitted to the CER for review</li> <li>August 17 - No findings associated with COVID-19</li> <li>September 8 – Spread 2. No findings associated with COVID-19</li> <li>September 14 – Westridge. No findings associated with COVID-19</li> </ul>

Lead Regulatory Compliance during COVID-19				
Agency	Interaction	Compliance Activities		
		<ul> <li>September 21 – Spread 4B – Operations and TMEP focused. No findings associated with COVID-19</li> <li>September 28 – Spread 3/4A. No findings associated with COVID-19</li> <li>October 7 – Spread 3/4A. BC EAO inspection. No findings associated with COVID-19</li> </ul>		

Table 1: Regulatory Interactions:

# 4 TRANS MOUNTAIN AND TMEP COVID-19 RESPONSE

Trans Mountain formalized its specific Trans Mountain COVID-19 Response Plan for including requirements, guidelines and precautions on March 24, 2020. Trans Mountain released an updated plan June 29, 2020. The updates include alignment with new or changing provincial and federal guidelines.

The plan is continually reviewed and updated and has been included in Appendix B. In accordance with health authority guidelines the plan deals with communication and awareness, cleaning protocols, personal protective equipment, physical distancing, site operations, and interactions with communities and landowners. It addresses what workers must do if feeling ill and procedures for returning to work. The plan also defines Trans Mountain's requirements of its Contractors during the pandemic.

The Trans Mountain Expansion Project has developed "Personal Safety Kits" that were distributed to all field workers including Indigenous workers in mid-August 2020. These kits contain two personal sized Health Canada approved hand sanitizers, a package of single-use disposable non-medical masks, Health Canada approved disinfectant spray bottle (1L), roll of paper towel, safety data sheets for hand sanitizer and disinfectant, information sheet from the Government of Canada, and a letter from David Safari, Executive Vice President, TMEP. See image below demonstrating kit contents.



Figure 4: Personal Safety Kit Contents

Trans Mountain has collaborated and coordinated the development of the industry-leading guidelines, procedures and protocols across the Company to ensure the continued safe construction of the Expansion Project and operation of the pipeline system. This coordination group is chaired by the Company Director, Environment Health and Safety (EHS) and meets on an ad-hoc basis and more regularly as required. Senior Leadership approve all documents released to the workforce and the contractors. This task force also acts as problem solver for COVID-19 issues/concerns from the field locations. The task force allows Trans Mountain to maintain a heightened level of knowledge and experience around COVID-19 matters and allow for proactive surveillance of new and changing measures.

All recommendations from the coordination team are reviewed and considered by the Executive Vice President, TMEP, and the Vice President, Operations. The Senior Management Committee (SMC) of the Company, chaired by the President and CEO, meets weekly to review, consider and approve any measure or recommendation that has broad implications on the workforce and worker safety policy.

## 4.1 GENERAL REQUIREMENTS

TMEP Site Supervision and Health and Safety teams monitor the implementation and effectiveness of these plans and enforce the requirements contained within. Weekly internal safety inspections are conducted by Health and Safety leads or safety inspectors at all facilities. If any non-compliance is identified, it is documented, and corrective action is undertaken.

These COVID-19 measures have developed rapidly and have been readily accepted by the workforce. Modification and sustainment are supported through training and communication to ensure

awareness and to reinforce these new norms. Reporting COVID-19 safety, hygiene and physical distancing wrongdoings are reinforced as part of near-miss reporting.

Trans Mountain workforce and contractors are encouraged to correct behaviours in the field and communicate these events to ensure compliance with Company requirements and continuous improvement.

#### 4.1.1 Before Being Permitted on TMEP Worksites

This section provides a summary of what workers must do before arriving at any TMEP work site. This includes existing and future camp locations.

- 1. Self-Declaration Questionnaire on current symptoms is completed including travel and exposure history (see Appendix C: Trans Mountain COVID-19 Self Declaration Questionnaire). Workers reporting for work at a Trans Mountain worksite must complete the attached self-declaration questionnaire prior to accessing the worksite. The completed form must be evaluated by Trans Mountain site security. The form must be kept with the worker at all times and must be available for display upon request. If conditions or symptoms change, a new form must be completed.
- 2. **Temperature screening** (see Appendix D: Trans Mountain Site Access Temperature Screening Protocol).
- 3. **Declaration** and sign-off (see Appendix C: Trans Mountain COVID-19 Self Declaration Questionnaire, page 2). As a condition of employment, workers must agree to:
  - The information that I have provided above is true and correct.
  - I agree that as a condition of my employment I will comply with all Trans Mountain Covid-19 procedures on site AND while offsite.
  - I agree to provide all information to my employer on my home location/sleeping location including Indigenous or First Nations communities, in which I spend time or reside in.
  - I agree to provide all required information on close contacts that could be affected in the case of my positive or suspected COVID-19 diagnosis.
  - I agree that if my health status is changed relating to COVID-19, I will inform my employer, Trans Mountain and health authorities.

Workers are required to **STAY AT HOME** and self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19 (see Appendix B: Trans Mountain and Trans Mountain Expansion Project COVID-19 Response Plan).

In addition to the above, specific Indigenous community requirements have been implemented across the Project. All workers are required to identify their living location as part of conditions of the self-declaration and in the Response Plan.



Figure 5: COVID- 19 protocols: Prior to entering work site

#### 4.1.2 Physical Distancing

Trans Mountain field locations, facilities and construction offices are managed to keep different crews/trades and individuals physically separated and to reduce high traffic areas. Procedures and protocols that have been in effect include:

- One-way staircase use is required wherever practical to minimize worker contact; workers are directed to wait for staircases to clear of oncoming traffic before using.
- Workers are directed to keep two metres distance from one another at the worksite including during informal discussions with co-workers, at tailgate meetings, and while physically working.
- Face-to-face contact from less than two metres distance and direct person-to-person contact (shaking hands) is prohibited.
- Meetings in office settings are limited to 10 persons or less and must follow physical distancing. Workers are encouraged to hold small site-based meetings out doors and with suitably physical spacing, if weather permits.
- Mass gathering restrictions are in place that align with local, provincial and federal guidelines.
- Appropriate signage that limits the number of occupants in a restricted area (confined space, pipeline excavation, welding area, pig launcher/receiver platform, etc.). I.e. WORKER RESTRICTIONS IN EFFECT.
- Coffee and lunch breaks are scheduled to limit exposure of workers to other workers. Eating is restricted to clearly identified dedicated eating areas. Eating areas will have handwashing stations, cleaning and disinfectant materials, and adequate space to maintain minimum physical distancing. All Trans Mountain facilities and work sites are prohibited from ordering communal food platters and buffets for the workforce.

Control Centre Operators (CCO) are responsible to ensure safe movement of products in the pipeline system. They normally work near one another. Special measures have also been taken to address Control Centre Operations. The CCO shifts have been split up with the main and backup locations

working concurrently to allow greater distancing. A tertiary back-up has also been established with fully segregated workstations should they be necessary. CCOs are also required to check their own temperature before reporting to their shift.



Figure 6: Physical distancing examples

#### 4.1.3 Cleaning

Trans Mountain has established hygiene and sanitation guidelines for all workers at Tran Mountain locations. Signage is posted at facility entry points outlining the commitment to maintain all health and safety measures when working for and on behalf of Trans Mountain during the COVID-19 pandemic. All hygiene and sanitation products at Trans Mountain meet requirements set by Health Canada to effectively kill the COVID-19 virus. Trans Mountain's Central Stores based out of Kamloops, BC, has procured a sufficient supply of hygiene and sanitation products to address current needs. Trans Mountain has also been working with its contractors to procure sanitation products in cases where they are having difficulty. Proper instruction is sent out with each sanitation package to ensure supplies are decanted and diluted to the appropriate concentration and appropriate sanitization times are implemented.

At existing Trans Mountain facilities and construction sites, Trans Mountain has a specific cleaning protocol is applied to work vehicles, including buses, trucks, UTVs or any vehicle type (see Appendix B). Vehicles are sanitized, thoroughly cleaned and disinfected at the end of shifts and between users. Buses used to transport workers to and from site have been configured for physical distancing. This has decreased the number of workers on each bus significantly and increased the number of buses used daily.

Trans Mountain and its contractors sanitize heavy equipment and vehicle components with sanitizing wipes or bleach solution. A sufficient supply of hand sanitizer has been distributed to Trans Mountain workers. Hand sanitizer is used after filling up vehicles at gas stations, transfer of tools, prior to eating, etc. Trans Mountain has limited the use of shared tools. Sharing pens, computers and passing around tailgate forms to be signed is not allowed. If shared tools are required, there is sufficient bleach solution to sanitize between users. Crews are assigning one person per crew to look after the paperwork and sign others onto sign-in sheets, tailgates and job hazard assessments (JHA). Hygiene practices have been incorporated into all aspects of the day to day activities of workers.

Remote facilities and pump stations have sufficient supply of bleach solution, latex gloves, towelettes for sanitation of hard surfaces and high traffic/touch surfaces. Surfaces are cleaned at least twice per

day, and at the end of the shift in the event of a call out a night and for returning crews the following morning.

Lunchrooms and all communal areas are cleaned thoroughly on a regular and frequent schedule, and cleaning is reported on a tracking sheet. Access and use of shared devices like coffee machines, water fountains, microwave ovens, and similar in lunchrooms is limited.

Each worksite must have potable water, soap, paper towels, and proper garbage disposal. Alcohol-based sanitizer (containing at least 60 per cent alcohol) must be available as a temporary solution should wash facilities be unavailable.



Figure 7: Cleaning and Transportation in field

#### 4.1.4 Personal Hygiene

Workers are directed to ensure handwashing, using soap and water for 20 seconds, is done on a frequent basis in the provided wash facilities. If soap and water are unavailable, alcohol-based hand sanitizer (containing at least 60 per cent alcohol) is used. Workers are also directed to follow all other recommended guidelines regarding personal hygiene.

## 4.1.5 Additional Protocols

In addition to basic universal protections such as increased hygiene, self-isolation, and physical distancing additional protections have been implemented in the field:

- **COVID-19 Safety Protocol training** and awareness is covered at safety and tailgate meetings augmented by workplace safety posters and other communications.
- External facing signage is also being used at worksites notifying that COVID-19 measures are in place.
- Enhanced reporting of workforce availability is in place which allows comprehensive tracking of employee health status, work location, and availability.

## 4.1.6 Personal Protective Equipment (PPE)

Following leading practices and based on TMEP's retained medical doctor, enhanced PPE is used (masks/gloves) in instances where physical distancing is not possible due to required work tasks (allocated as per Appendix E: Trans Mountain Safety Precautions When Working Within two metres of

Other Workers Guidance) and in instances in which workers are accessing private lands as outlined in Section 4.9 of this document.

In situations where the physical distancing requirements cannot be maintained, under the guidance of a health and safety advisor or supervisors, enhanced PPE and appropriate hygiene practices must be used to carry out the work. Workers will wear a particulate filtering mask (procedural, N95, P100 or other equivalent), eye protection, and gloves. Below is a list of the specific PPE procured by Trans Mountain for use during COVID-19:

- Disposable procedural masks
- N95 respirators
- Half mask with P100 filters
- Nitrile gloves
- Face shields
- Safety glasses
- Cartridges (P100 and defender) for half masks

Workers are trained on how to wear, remove and dispose of masks, including performing good hand hygiene before fitting the mask and after taking it off. The workforce is trained in care, use, storage, maintenance, disposal and protection of all PPE.

Trans Mountain continues to procure and provide personal protective equipment for workers. This includes basic supplies, such as hand sanitizer, as well as procedural masks, cloth masks and half-mask respirators for use in situations where physical distancing cannot be maintained during the work assignment, and work must proceed. These measures have been implemented to support the safety and security of both the workers working on Trans Mountain sites and the communities where they work. All control measures are discussed during the daily tailgate safety meetings, job hazard assessments and documented during the Field Level Risk Assessment process.

All operations workforce have a personal supply of PPE either at their workstation or in their vehicle. This includes safety glasses, half-mask respirator, full-face respirator, N95 masks, face shield, extra P100 defender and particulate cartridges and a box of nitrile gloves (100). This PPE is assigned to each worker and typically used for all work. This PPE is used to adhere to all COVID-19 protocols and in the event of an emergency. Proper respirator maintenance is strictly followed including requirements to minimize unnecessary contact with the respirator surface, adherence to hand hygiene practices, proper PPE donning and doffing techniques, physical inspection checks and performing a user seal check. Respirators are to be hung in a clean area or keep in a clean, breathable container between uses.

As an early response planning action, Trans Mountain acquired additional enhanced PPE supplies for Trans Mountain workers and to augment contractor inventories. Trans Mountain has adequate PPE in stock for the foreseeable future, based on the current and anticipated workload for the Expansion Project and for Operations.

## 4.2 CONTRACTOR MANAGEMENT

As part of the Trans Mountain Expansion Project, the Company has hired several General Construction Contractors (GCCs) and Engineering, Procurement and Construction (EPC) contractors to enable construction of the Project. Trans Mountain requires its Contractors and sub-contractors to develop and implement an appropriate and Trans Mountain-compliant COVID-19 plan to support the health and safety of the workforce at all worksites. These Contractors' plans must meet or exceed the measures set out in Trans Mountain's own plan, follow all local government, provincial and federal guidelines, and at a minimum, include mitigative measures implemented and to be implemented in the future to reduce contamination and propagation of COVID-19, response to be taken if someone is identified to be symptomatic on site (develops fever, cough, runny nose unrelated to allergies, etc.), and PPE arrangements (direction for use and preparation for escalation of use). Contractor Requirements for COVID-19 reporting were updated in May 2020. All TMEP GCC/EPC contractors and direct subcontractors to TMEP are now required to complete and submit a daily COVID-19 report to the appropriate TMEP Project Manager, TMEP Health and Safety Lead, and TMEP EHS COVID-19 Response Coordinators that includes the following:

- Daily statistics (inclusive of reporting sub-contractors) of active, isolated (illness unrelated, suspected or confirmed COVID-19 cases), working from home (may or may not be isolated worker) and persons who identify as First Nations or Indigenous descent who report the following:
  - Declare or display symptoms of illness.
  - o been directed to self-isolate and undergo testing.
  - have tested positive for COVID-19. (If worker is tested and a confirmed positive case, it must be reported immediately).
- Current mitigative measures in place.
- Crew locations for the following workday.

As appropriate, updates to Trans Mountain requirements, plans, procedures, protocols, and guidelines are provided to Contractors via supply chain contract administrators, ISNetworld, email dissemination via Trans Mountain Health and Safety workers, and an external access site that has been developed specifically for the Contractors to have access to updated Trans Mountain COVID-19 information, procedures and protocols.

Trans Mountain is also working with and inspecting smaller contractors to ensure the same information is available and that all COVID-19 prevention measures are being undertaken.

# 4.3 TRAINING

Trans Mountain is currently providing training for Trans Mountain field workers in the form of all-hands meetings which are held on an ad-hoc basis and target all field workers, including Project management, health and safety, and environment. The TMEP Director, Health and Safety, hosts and facilitates the meeting, which provides an avenue for the following;

• Overview of revisions and updates to existing plans, protocols, procedures and guidance documents.

- Overview of new plans, protocols, procedures, and guidance documents.
- Expectations and considerations for field work.

An online training module has been developed for COVID-19 which includes information about COVID-19 and associated best practices and guidance. It also includes specifics about handwashing practices, facial mask donning/doffing, cleaning protocols, how and where to access COVID-19 testing and available resources, mental health and stress resources, and an overview of Trans Mountain COVID-19 programs and requirements. Trans Mountain requires all office workers complete the module prior to returning to the offices. Trans Mountain also requires all field personnel complete the module as part of their safety training. The training module has been provided to TMEP general construction contractors as a tool they may choose to use to augment their current training program.

#### 4.3.1 Contractor Orientations

The Trans Mountain Contractor EHS Orientation continues to be administered. Trans Mountain verifies completion with contractors and continues to complete site specific orientations onsite at Trans Mountain locations. Modifications to ensure COVID-19 requirements are met and have been employed. Verification of completion of the Trans Mountain Contractor EHS Orientation and site-specific orientations is done while maintaining appropriate physical distancing. Emphasis is placed on not sharing writing instruments or handling documentation. Electronic documentation transfer is preferred.

## 4.4 Workforce Exposure, Self-Isolation and Contact Tracing

Trans Mountain workers are required to notify their supervisor and stay home if they are sick or show ANY signs of illness. Workers are required to self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19.

When a worker reports COVID-19 symptom or has a positive diagnosis, Human Resources or the TMEP Health and Safety representative conducting oversight for the extended workforce follows up with the individual and their supervisor to begin contact tracing within the workforce.

Human Resources first identifies the individual's current work situation (home/office/field) to determine the possible exposures to other workers. Depending on their current working situation, additional questions are asked related to accommodations, interactions with other workers and which sites/offices had been visited within the previous two weeks. If there are known or suspected exposures to additional workers, those workers are sent home to self-isolate. Workers who are sent home to selfisolate are required to isolate until a negative test comes back on the original worker; or if the test is positive for the original worker, the additional workers will remain in self-isolation for 14 days. If those workers begin to exhibit symptoms they are required to remain in isolation for at least 10 days after the onset of symptoms and be fever free, without the use of fever reducing medications such as Acetaminophen, Aspirin, Naproxen and Ibuprofen, for at least 24 hours before returning to work.

#### 4.4.1 Possible Cases

There are two scenarios Trans Mountain has developed to respond to possible cases:

#### Case 1 - Symptoms and Approach – Found Before Work:

Workers are required to remain at home, call their supervisor and self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19. Workers who self-isolate or identify as having COVID-19 symptoms, but do not seek testing or are unable to obtain testing, must self-isolate for 10 days from the onset of symptoms unless the symptom is related to a pre-existing health condition (see Appendix B: Trans Mountain and TMEP COVID-19 Response Plan). Worker contact medical authorities and seek a COVID-19 test if directed to do so by medical authorities.

#### Case 2 - Symptoms and Approach – If Found While Onsite:

If a worker indicates they are experiencing symptoms while at work, they are required to immediately notify their supervisor and/or their Trans Mountain site representative. At that time, the worker is required to leave the worksite and self-isolate until medical direction is received, or the 14-day self-isolation timeline is met. If there is probable contact with workers on the site, the site may be shut down immediately pending test results. Workers are to seek medical direction on the need for COVID–19 testing.

When an Indigenous worker has declared symptoms, the worker is directed to self-isolate. To prevent potential spread, Trans Mountain is committed to arrange for isolation accommodations such as a hotel (however will not include an active Trans Mountain accommodation site, i.e. camp) until a COVID-19 test is performed and results are confirmed – or the isolation term is complete and medical clearance occurs. Trans Mountain will also coordinate the provision of food and other personal necessities while in isolation (i.e. meal delivery).

If a worker who is symptomatic wishes to return to their home in a vulnerable or Indigenous community, the community health centre must be notified to determine that sufficient resources are in place to support isolation of the individual upon arrival.

In addition, Trans Mountain, for its workforce, has developed a procedure for managing presumptive and positive cases of COVID-19. Within that procedure, a decision matrix exists that outlines nine scenarios that will be handled in a rapid manner. It establishes roles and responsibilities of the worker and their supervisor. See appendix F for this matrix.

#### 4.4.2 COVID-19 Testing and Results

#### 4.4.2.1 Positive Test

Upon a positive COVID-19 test, Trans Mountain will be immediately notified and will ensure all appropriate health authorities are informed including providing information on contact tracing. Trans Mountain will ensure any other appropriate government notifications are made. Trans Mountain will work with Contractors and health authorities to ensure appropriate health authorities community workers are notified of the case. Trans Mountain will work with the contractor to establish and notify the workers on site (or offsite) who are likely to have been exposed to the COVID-19 positive worker. The following steps will then be taken:

- 1. Workers who are deemed to have been in close contact will be required to leave the site and immediately self-isolate and monitor for symptoms. The definition of close contact is relevant to the use of PPE and includes those who:
  - a. provided care for the individual, including health care workers, household members OR;
  - b. other caregivers, or who had other similar close physical contact without consistent and appropriate use of personal protective equipment OR;
  - c. lived with or otherwise had close prolonged contact (within two meters) with the person while they were infectious OR;
  - d. had direct contact with infectious bodily fluids of the person (e.g., was coughed or sneezed on) while not wearing recommended personal protective equipment.
- All workers on that site will be put on alert to monitor for symptoms but will be allowed to remain on site as long as they pass daily screening requirements and remain symptom-free. TMEP will be conservative in its judgment and, if necessary, will close the site if it suspects a potential outbreak.
- 3. TMEP will communicate with communities and stakeholders as appropriate to ensure they have the facts on the situation. This will be undertaken via the respective Community Liaisons and Indigenous Field Advisors in conjunction with subject matter experts.

### 4.4.2.2 Negative Test Response

If a worker receives a negative test, they must sign a confirmation that they have received a negative test from the jurisdictional health authority before returning to site because jurisdictional health authorities do not provide documentation on negative test results. In Alberta, individuals receive a phone call to indicate the test was negative with no physical or digital verification method. In BC, individuals that test negative do not receive a phone call or any documentation. If they test positive, they receive a phone call within 72 hours. The worker must be symptom free for 24 hours without the aid of symptom-relieving medications prior to returning to work.

#### 4.4.3 Return to Work

All workers must be healthy to return to work. All workers and visitors are required to complete and sign a COVID-19 Self-Declaration Questionnaire prior to being granted access to any Trans Mountain facility or Project work-site. In addition to the self-declaration questionnaire, if a worker received a positive diagnosis of COVID-19 they must be cleared by a medical professional and provide proof of that clearance before returning to work. If an answer on the questionnaire changes, or a worker answers yes to any question regarding COVID-19 exposure risk, they must immediately notify their supervisor and/or Trans Mountain site representative.

## 4.4.4 COVID-19 Field Testing

Trans Mountain will continue to use public health care facilities as their main source of testing for COVID-19 where available, particularly in communities where there is significant capacity to conduct these tests. To supplement this publicly available testing and the additional safety measures already implemented, Trans Mountain has taken proactive steps and is securing the ability and technology to be able to perform a rapid COVID-19 test in the field. Rapid testing can provide several benefits to the workforce including:

- Providing a rapid response and mass testing if a confirmed case arises at a worksite.
- Allowing Trans Mountain to isolate quickly and contain the virus spread within a worksite.
- Allowing workers with COVID-19-like symptoms to return to work quicker, as these symptoms may be a result of a common cold or flu.
- Shortening the self-isolation time.

Trans Mountain continues to monitor the pending Health Canada approval of rapid testing kits. Trans Mountain continues to monitor the following:

• Spartan Cube CYP2C19 - Spartan Bioscience – Ottawa, Ont. - This Canadian-made "Spartan Cube" point of care testing kit uses DNA analysis as the diagnostic platform to test for the COVID-19 virus and is highly portable, making it an efficient solution for field use. The testing is completed using a nasal or back of the throat swab test. Test results are available approximately 30 minutes post-testing.

Trans Mountain monitors this evolving science and continues to evaluate alternative solutions to the one identified above. Trans Mountain is currently developing a testing strategy for these devices to ensure their most effective and efficient use to maintain a safe work environment and ensure continued safe operation and construction activities.

# 4.5 ON-SITE CONSTRUCTION SECURITY

Trans Mountain's construction onsite security is provided through joint ventures between existing security companies and Indigenous communities; known as Security Joint Venture partners. Trans Mountain ensures that security guards have adequate PPE and cleaning and sanitizing supplies to clean vehicles and hotel rooms. The Security Team has three conference calls every week where information regarding the status of COVID-19 procedures and reporting is shared. The Security Team also has a weekly conference call with Security Joint Venture partners to discuss and provide COVID-19 status updates.

Trans Mountain's Security Liaison is notified immediately of any worker displaying potential COVID-19 symptoms. Trans Mountain's security program encompasses the following components for worker safety:

- Ensuring that the worker does not require immediate medical attention.
- Advising them to stay in their hotel until appropriate alternate arrangements can be made.
- Ensuring the isolation of the worker.
- Verifying if the worker has travelled with anyone and implementing measures to reduce or contain possibility of spread.
- Investigating all points of contact and possible contamination.

Additionally, in the case of Indigenous security workers who display symptoms, Trans Mountain advises the worker's home community that one of its members has symptoms and wants to return to their Nation. Trans Mountain shares pertinent information including:

• Worker's current living conditions (how many people in the house).

- Concerns expressed by worker (i.e. a family member with pre-existing medical condition).
- Results of worker self-isolation and, if they have been tested for COVID-19, the results of the testing.

Regional Security Managers providing on-site construction security report directly to Trans Mountain's Indigenous Security Liaison. Trans Mountain is fully aware from which Indigenous community each of its guards are from, and where they reside on their days off (i.e., on reserve or off reserve).

Trans Mountain's Security Manager stays in contact with workers and receives regular status updates. Trans Mountain also remains in contact with the Nation to understand any concerns have been identified in the community as a result of the worker returning to the community.

# 4.6 ADDITIONAL MEASURES SPECIFIC TO INDIGENOUS PEOPLES

Trans Mountain, through participation in provincial and federal COVID-19 planning coordination meetings, and the mindfulness of the impact operations and construction might have to the communities it works in, is aware of a number of resources and supports available to Indigenous Communities to prepare, respond and recover from COVID-19 pandemic. In March 2020, the federal government announced two funding tracks to support Indigenous communities in preparing for and responding to the COVID-19 pandemic.

To build on these programs, Trans Mountain has taken additional measures to complement the existing resources available to protect Indigenous workers and minimize potential exposure risk to Indigenous communities.

Trans Mountain acknowledges the concerns raised by Indigenous communities about their capacity to manage the increased health and personal safety needs of their communities during this pandemic. Indigenous peoples and their communities are a top priority for Trans Mountain. The Company is committed to assist with protection of, to the greatest extent possible, the communities from which its workers travel and reside in while working for Trans Mountain.

The following additional measures are in place or being undertaken for protection and risk minimization:

## 4.6.1 Indigenous Worker Personal Safety and Prevention Measures

The best first defense to minimize risk is prevention. To that end, the overall COVID-19 management program applies to all of the Project workforce including Indigenous workers. In addition, for Indigenous workers Trans Mountain is implementing or providing:

- As a preventive indicator, a program for temperature testing for all workers on arrival *and* voluntary screening upon departure from the worksite.
- Where an Indigenous worker has declared symptoms, the worker is required to report symptoms and as a result, may be directed by Trans Mountain to self-isolate. To prevent potential spread, Trans Mountain is committed to providing support for workers with isolation arrangements such as accommodations, safe transportation, however may not include an active Trans Mountain accommodation site, i.e. camp) until a COVID-19 test is performed and results are confirmed – or the isolation term is complete and medical clearance occurs. Trans

Mountain can assist with coordination for the provision of food and other personal necessities while in isolation (i.e. meal delivery).

- A "COVID-19 personal safety kit" has been supplied and will continue to be supplied as a support tool for Indigenous workers. The contents are described above in *Section 4 TM and TMEP COVID-19 Response*.
- Where an Indigenous worker has declared or displayed symptoms or is directed for COVID-19 testing and self-isolation, Trans Mountain may cover reasonable directly related expenses associated with the isolation, including meals and continued compensation subject to following all isolation and COVID-19 mitigation requirements during the isolation and until medical clearance is received. Other isolation related costs may be considered at Trans Mountain's discretion.
- A clear expectation in place for worker behaviour when off duty as it relates to COVID-19 risks will require written acceptance of Trans Mountain COVID-19 requirements from each worker with the objective of identifying and reducing risks to home communities and work sites. Adherence to Trans Mountain requirements for respectful behaviour outside the work site includes commuting to and from the work site to lodging and while present in any locale. No worker will cause or bring harm to host communities.
- Workers will not visit or otherwise travel to or enter a First Nation or other Indigenous community, unless it is where they reside or without the expressed, written permission from the required authority of that community.

## 4.6.2 Indigenous Worker Health Monitoring and Reporting

Trans Mountain ensures its Contractors track and report to Trans Mountain, on a weekly basis, the number of Indigenous workers active on a Trans Mountain site, who:

- a. declare or display symptoms of illness;
- b. have been directed to self-isolate and undergo testing; and
- c. have tested positive for COVID-19. (If worker is tested and a confirmed positive case, it must be reported immediately).

#### 4.6.3 COVID-19 Related Information Disclosure

Trans Mountain recognizes that Indigenous communities have a need for information related to their membership working for the Company. Prior to construction in an area several disclosure measures are in place or continue to be developed as needed, so implementation can provide as much information as possible, while respecting employment legislation and the need for confidentiality and personal privacy. For the purposes of potential disclosure, Trans Mountain may require a worker to provide the following:

- a) Community affiliations including:
  - i. The location of accommodations where a worker resides when on-shift, if not a Trans Mountain designated accommodation.
  - ii. Where a worker resides when off-shift (during a required isolation).

- b) For the purposes of identifying the scope of isolation requirements:
  - i. Worker's home community (geographical community of residence, particularly if that is the location of their primary residence.
  - ii. The number of people who reside in their primary household.
  - iii. Agreement to limit the number of people co-accommodating while on-shift.
  - iv. R any exposure to known or suspected infected individuals.
- c) A Trans Mountain worker, who lives or resides in an Indigenous community, will be required to immediately inform an appropriate official of their community if they have been identified as presumptive by Trans Mountain, or if they have tested positive for COVID-19. The worker is also responsible to report to Trans Mountain that such communication with the community has taken place.
- d) Where a worker lives or resides in an Indigenous community and works for Trans Mountain as an employee or contractor, the worker will be required to immediately inform the leadership of their community if they have been identified as presumptively infected or have a confirmed COVID-19 diagnosis.

The above noted disclosure-related measures are initiatives regularly evaluated for implementation and are subject to verification of compliance with all laws and regulations. The measures are regularly reviewed as potential special measures to address the unprecedented risks associated with operating during a pandemic. The disclosure of such information would allow Trans Mountain and Indigenous communities working on the Project, to understand how many workers are travelling to and from their respective locations.

## 4.6.4 Enhanced Indigenous Engagement Measures

Enhanced measures may be implemented address COVID-19 concerns and could include the following categories:

- Enhanced Engagement Resources:
  - Trans Mountain has dedicated resources for Indigenous communities as part of its normal course of business and its ongoing Indigenous engagement. Indigenous Relations Advisors are assigned specifically to all communities and are the "relationship owners" who have long-term, well-established relationship with communities.
- Enhanced Communications:
  - Increase the use of social media tools targeted to Indigenous communities, using Indigenous media and high-use sites and tools, direct-to-community targeting, linking-in with existing community social media tools, reporting etc.
- Indigenous Monitoring (IM) Program:
  - Trans Mountain's Indigenous Monitors continue to be engaged safely in their day to day work on the Project, their field findings and reporting are made available on-line, in a timely manner. Other measures can include:
- The exploration, for possible implementation, of options for "virtual" monitoring, items such as use of digital devices and technologies (i.e., video platform(s) or installed cameras on a site or activity) for field work, where Indigenous communities could virtually visit sites "realtime" while Trans Mountain field environment workforce and or IMs are "on the ground".
- Continuing to provide monitoring reports that include pertinent information for communities and explore options for the use of other digital tools in our reporting.
- In addition to these enhanced measures, Trans Mountain has advised its Indigenous Monitors that should they opt not to work during the period of the declared pandemic due to personal safety concerns, they may do so without consequence and are welcome back to their roles when they feel safe to do so. During this period, Trans Mountain will explore options for IMs to work virtually from their home, with their integrated Environmental Inspection Team, to continue to provide their Indigenous knowledge. Should a Monitor choose not to work at all, Trans Mountain will consider compensation measures to support them while they self-isolate to protect themselves and their communities.
- Indigenous partner community support fund:
  - Trans Mountain has developed a fund dedicated to support COVID-19 related requests from Indigenous communities engaged in the Project, or who work for the existing, operating pipeline.
  - This fund will be established to provide support not otherwise provided by other parties (i.e. provincial or federal governments and agencies) and would enhance a partner communities' ability to continue to be involved in Trans Mountain work. Supports include providing personal hygiene safety supplies, and home safety supports for Trans Mountain Indigenous workers and their families.

# 4.7 INDIGENOUS MONITORING PROGRAM

The Trans Mountain Expansion Project retains Indigenous Monitors (IMs) as integrated members of its Environmental Inspection team during construction. Through the IM Program, IMs work with Environmental Inspectors to monitor compliance with approved mitigation measures, particularly in relation to traditional resource use as well as cultural and heritage considerations. IMs may participate and build capacity in other environmental inspection duties and bring an Indigenous lens to environmental inspection activities.

The TMEP Indigenous Monitor Program is continuing in active construction areas where the Program is required, and Trans Mountain continues to work to ensure all commitments made will be fulfilled. Trans Mountain maintains an active roster of IMs to support ongoing construction activities.

Throughout the COVID-19 pandemic, Trans Mountain has maintained regular, direct communication with its Indigenous Monitors who are active on the monitoring roster in areas of active construction, as well as with their Indigenous group points of contact. This on-going communication occurs at two levels:

• At construction sites, regular communication with IMs occurs daily at site meetings with the Environmental Inspection Team and construction counterparts. IMs are integrated members of the Trans Mountain Environmental Inspection team on-site and are included in all information sharing and requirements regarding TMEP protocols. For example, IMs are included in site

requirements including: pre-screening self-declaration questionnaire, temperature screening, social distancing, weekly self-report dashboard tool and guidance for work in close proximity. As COVID-19 requirements have been developed and implemented, active IMs receive information and briefings at site via Trans Mountain Health and Safety Leads and their Lead Environmental Inspectors.

• At an administrative level, regular direct IM communication typically regards shift scheduling, rotations, request for additional information or support. During recent times communication has evolved to include updates and questions regarding COVID-19 requirements and developments on-site.

On a monthly basis, Trans Mountain makes available its Indigenous Monitor Overview Reports. These reports provide highlights of the Indigenous Monitors' day-to-day work and key mitigation measures observed by the Monitors related to work on the Expansion Project. In addition to posting the reports on the Trans Mountain website, they are also provided to the Indigenous groups that have Monitors present during construction activities. Reports include an overview of Trans Mountain's COVID-19 response.

Recipients of the August 2020 IM Overview Reports				
Regional Report	Indigenous Groups			
Edmonton Region (Spread 1)	Papaschase First Nation			
<ul> <li>Report sent September 23, 2020</li> </ul>	Enoch Cree Nation			
	Samson Cree Nation			
Yellowhead Region (Spread 2)	Samson Cree Nation			
<ul> <li>Report sent September 23, 2020</li> </ul>	Ermineskin Cree Nation			
	Paul First Nation			
	Alexis Nakota Sioux Nation			
	Enoch Cree Nation			
Jasper Mt Robson Reactivation	Simpcw First Nation			
Report sent September 23, 2020	Aseniwuche Winewak Nation			
North Thompson	Simpcw First Nation			
Report sent September 23, 2020				
BC Interior	Lower Nicola Indian Band			
<ul> <li>Report sent September 23, 2020</li> </ul>	Upper Nicola Band			
	Nooaitch Indian Band			
	Coldwater Indian Band			
	Tkemlúps te Secwépemc			
Coquihalla Hope	Lower Nicola Indian Band			
Report sent September 23, 2020	Nooaitch Indian Band			
	Coldwater Indian Band			
Lower Mainland	Kwikwetlem First Nation			
Report sent September 23, 2020	Semiahmoo First Nation			

The most current report was provided to the Indigenous groups listed below in Table 2.

Table 2: Indigenous Monitor Monthly Report

IMs are integrated members of the Trans Mountain Environmental Inspection team on-site, and are included in all information sharing and requirements regarding TMEP protocols. For example, IMs are included in site requirements including: pre-screening self-declaration questionnaire, temperature screening, physical distancing, weekly self-report dashboard tool and guidance for work in close proximity (e.g., use of masks).

The TMEP Indigenous Monitor Program is continuing in active construction areas where the Program is required (see Table 3 below). Trans Mountain continues to work to ensure all commitments made will be fulfilled. Trans Mountain also remains flexible in working with Indigenous communities participating in the monitoring program. For example, any IM who elects not to work may stand down voluntarily and temporarily during the COVID-19 period without losing their position and will be welcomed back when they are ready.

Spread/Region	# IM active positions (Full-time equivalents)	# of individual IMs rotating into the active positions	Where residing when on shift
Spread 1	3	6	1 FTE – residing in hotel (Samson Cree) 1 FTE – residing at home (Enoch Cree) 0.5 FTE – residing at trailer and rental accommodation (Papaschase)
Spread 2	3	6	1 FTE – residing in hotel (Samson Cree) 0.5 FTE – residing in hotel (Ermineskin Cree) 1 FTE – residing in hotel (Alexis Nakota) 0.5 FTE – residing in hotel (Paul)
Spread 3/4A	1	2	1 FTE- staying at hotel (Simpcw)
Jasper-Mt Robson Reactivation	2	3	2 FTE - residing in hotel (Simpcw, Aseniwuche Winewak Nation)
Spread 4B	1	2	1 FTE – residing at home (Simpcw)
Spread 5A	1	1	1 FTE residing at home (Tkemlúps te Secwépemc)
Spread 5B	2	5	1 FTE – residing in hotel (Lower Nicola) 0.5 FTE – residing at homein hotel (Nooiatch) 0.5 FTE – residing in hotel (Coldwater)
Kingsvale Powerline	3.5	7	3.5 FTE - residing at home (Lower Nicola, Upper Nicola, Nooaitch, Coldwater)
Westridge Marine Terminal	1	1	1 FTE - residing at home (Kwikwetlem)
Burnaby Terminal	1	1	1 FTE - residing at home (Semiahmoo)
TOTAL	15	28	

Table 3: Indigenous Monitors and Locations of Work

#### 4.7.1.1 IM Accommodation

Current IMs either reside at home or in hotels based on where the work site is in relation to their home community. Currently, there are (see Table 1):

- 9 active IM positions where the IM is staying at a hotel when they are on shift (either in Edmonton area, Hope area, Valemount, or Jasper); and
- 6.5 active IM positions where the IM is residing at their home (Edmonton area, Merritt area or Lower Mainland).

# 4.7.1.2 IM COVID Training

As COVID-19 requirements have been developed and implemented, active IMs have received information and briefings on-site via Trans Mountain Health and Safety Leads and their Lead Environmental Inspectors. Current developments on COVID-19 are discussed at regular site meetings.

A COVID-19 response overview is now included in onboarding training of new IMs brought on during COVID-19 times, as well as provided to IMs coming back on rotation after several weeks off. This provides awareness of Trans Mountain's overall COVID-19 Plan, the types of site-specific measures that will be required on-site and supports available to the IMs. Overview information about Trans Mountain's COVID-19 response is also provided to Indigenous communities that are new to the IM Program during COVID-19 times as their IMs are onboarded.

IMs are included in Trans Mountain updates and on-going information sharing related to COVID-19 developments. Trans Mountain continues to work directly with IMs related to any unique supports or questions (e.g., providing transportation support in order to avoid public transport in the Lower Mainland).

# 4.8 INDIGENOUS ENGAGEMENT COVID-19

Trans Mountain's commitment to engage with Indigenous People and their communities throughout each phase of construction and during operations remains as strong as it has always been. Trans Mountain understands the COVID-19 situation presents an unprecedented challenge for Indigenous groups, including their ability to respond to permit applications and other Trans Mountain Expansion Project related engagement.

Beginning on March 13, 2020 Trans Mountain restricted travel for all non-essential work. As a result, all Indigenous groups with upcoming or scheduled in-person meetings with Trans Mountain were contacted by an Indigenous Relations Advisor and informed that the Trans Mountain workforce was to avoid travel due to COVID-19. Engagement and consultation methods transitioned quickly to teleconference or using online tools such as Zoom, Skype or Microsoft Teams.

Trans Mountain is tracking requests received and issues reporting from Indigenous communities related to COVID-19 and continues to review requests and issues on a weekly basis. One purpose for tracking issues and requests is to determine if commonality exists across groups, or with issues and requests. To date, there is little commonality to either, and the volume is relatively low given current COVID-19 circumstances.

Generally, the types of requests Trans Mountain has received include:

- financial aid for community support workers;
- financial aid for food hampers that include also masks and sanitizer;

- opportunities that keep workers on the Project, or opportunities to get out-of-work community members, working on the Project;
- financial aid for enhanced security and safety capacity within the community;
- safety equipment and supplies;
- resources to assist in supporting vulnerable populations within the community;
- access to internet and laptops for online schooling and laptops for those who now are working from home;
- support for enhancements to internet and virtual communication systems, including phone and video conference capabilities;
- alternate means of receiving and reviewing Project permit applications (i.e. USB, FTP sites); and
- financial aid for food storage and security, including seeds for a community garden, building of food storage and fish smoking area, etc.

Trans Mountain has reviewed the "BC Consulting Guidelines During COVID-19" Bulletin released on March 25, 2020 by the BC Ministry of Indigenous Relations and Reconciliation, providing interim guidance for decision-makers who are responsible for consulting with Indigenous communities and organizations during the COVID-19 pandemic. In compliance with the bulletin, Trans Mountain has:

- suspended all non-essential travel as of March 17, 2020.
- been in contact with Indigenous groups to understand the nature of the various communities' operating status. Where groups are on limited operations or offices are closed, the Company has discussed the best ways to keep them informed and/or engaged;
- used virtual forums including phone, email and videoconferencing to continue engagement with groups where appropriate, based on each group's capacity to participate; and
- responded to requests for adjusted feedback timelines and have extended accordingly.

On July 10, 2020, version 3 of this COVID-19 Report was shared with Chiefs and Leaders of Indigenous groups along the pipeline corridor. The Report is updated on a monthly and will be shared with Indigenous groups as updates are published.

# 4.8.1 Engagement Activities

# 4.8.1.1 Email to all Indigenous Groups

On March 20, 2020, Trans Mountain emailed 257 people representing more than 115 Indigenous groups. These are people with whom Trans Mountain has had ongoing communication and engagement related to the Expansion Project.

The following provides the content of that email from Trans Mountain's Indigenous Relations Management:

I am reaching out to you as the head of Indigenous Relations at Trans Mountain, but more importantly as an Indigenous person who shares the concern for the safety of our broader Indigenous community. As someone who has worked with and for my community, I know how critical the care and safety of your community members are to you. This is why I wanted to send a note personally to let you know that Trans Mountain is taking the COVID-19 situation seriously. Last week we implemented a travel ban, and this week we sent our office employees and nonessential field employees' home to work in the safety of their homes, where they can also be a support to their families. We continue to work hard, but we are doing that safely from our homes. We have heard that many of you are doing the same.

We have all seen the rapid developments around COVID-19, and we have taken actions and steps to ensure the health and safety of our workforce and the communities we work in. We will continue to monitor the situation and take appropriate actions with the following objectives in mind: Maintain a safe work environment; Minimize the risk of virus spread; Ensure the safe operation of the pipeline and safe construction of the Expansion Project.

We continue to safely operate our existing pipeline, a critical piece of national infrastructure, and work continues on the Expansion Project. For both the existing pipeline and the Expansion Project, we are following all advice from government and health officials, including following social distancing protocols and requiring workers to quarantine if they have travelled outside of Canada. This is a dynamic situation and we will continue to respond in a thoughtful, balanced and disciplined way and consider all new and emerging guidance coming from government and health officials.

On behalf of my colleagues at Trans Mountain, I want to wish you continued good health. I will reach back out to you with any new, important information.

In the meantime, stay safe.

# 4.8.2 Email to Indigenous Groups with Commercial Agreements

On April 7, 2020, Trans Mountain's President and CEO sent a personal email to the 61 Indigenous groups with whom Trans Mountain has signed Commercial Agreements.

Additionally, Trans Mountain has held ongoing interactions with Indigenous groups in compliance with the terms of its commercial agreements.

# 4.8.3 Additional Engagement with Indigenous Groups

Trans Mountain has remained in continuous contact with Indigenous groups throughout the COVID-19 pandemic to check how communities are coping and if there were ways the Company could assist communities.

Trans Mountain continues to pursue permits required in BC. The permit referral packages include information about COVID-19.

On May 22, 2020, Trans Mountain's COVID-19 Report was shared with Chiefs and Leaders of Indigenous groups along the pipeline corridor. The report will be shared with Indigenous groups as updates are published.

A link to Trans Mountain's COVID -19webpage is included in Permit Referrals, Construction Notifications, engagement letters for recent CER Applications and in follow-up emails and/or during phone calls. An example is provided below:

Trans Mountain is actively monitoring the COVID-19 situation with the help of federal, provincial and local agencies. Trans Mountain's top priority remains the health and safety of our workforce, their families and our communities. Trans Mountain recognizes that the COVID-19 health emergency poses a unique and significant challenge to communities and that referral offices may be closed or functioning at a limited capacity. We seek to understand the circumstances in which you receive this information and to find ways to assist during this time. For the most up-to-date information on Trans Mountain's response to COVID-19, please visit <u>www.transmountain.com/covid19</u>.

# 4.9 COMMUNITY AND LANDOWNER

Ongoing operations and construction may require Trans Mountain workers access private lands. The program sets out specific direction in these situations and requires Trans Mountain workers do the following:

- Verify landowners have been notified prior to any access of their lands.
- Wear appropriate PPE which will include mask and gloves when accessing private lands and sanitize any touch points after completing the work including gates, locks and fences. PPE controls are not a replacement for physical distancing.
- Ensure landowner equipment and property are left clean and sanitized after completing work.
- Dispose of nitrile gloves properly in waste receptacles after leaving the property. When public interaction is indicated, confirm that the appropriate person is communicating and practice physical distancing.
- Use appropriate trash and recycling receptacles for waste products.
- When using community and public facilities, abide by all Trans Mountain guidelines, procedures, practices and jurisdictional requirements.
- Trans Mountain and its Contractor must establish a clear expectation for worker behaviour when off duty as it relates to COVID-19. Adherence to Trans Mountain requirements for respectful behaviour outside the work site includes commuting to and from the work site, lodging and while visiting any community. Workers must be diligent and prevent the spread of COVID-19 to communities in which they reside or visit. Trans Mountain's workforce must always minimize interaction with the public outside of work hours and practice physical distancing and good hygiene practices.
- Workers will not visit or otherwise travel to or enter a First Nation Reserve or other Indigenous community, unless they reside there, or they have the expressed, written permission from the authority of that community.

# 4.10 WORKER ACCOMMODATION

Trans Mountain Expansion Project's approach to worker accommodation is multi-faceted and will vary along the Project route depending on work location and activity. The plans consider a number of factors, such as accommodation capacities of local and regional communities, the size of the anticipated nonlocal construction workforce, balancing the potential for adverse socio-economic effects with the expressed desire to maximize economic opportunities in host communities, and the preferences from local and regional authorities. Trans Mountain is engaging with local communities and businesses to ensure non-local workers have a place to live while they're working — either in temporary camps or in communities through a mix of commercial and rental accommodation.

Trans Mountain's objective is to balance the positive impact of economic benefits for local accommodation, retail and service providers, with the need to satisfy local concerns about increasing demand on accommodation and housing.

As of July 2020, those working on the Project in the vicinity of the Valemount Camp are required to stay in the camp. This approach will be taken for all other areas where Trans Mountain establishes and / or occupies camps for its workers. In communities with no TMEP camps, Project workers, including employees, contractors and subcontractors, are required to stay in accommodation in adherence with provincial and federal Public Health COVID-19 orders and guidelines.

Trans Mountain's first camp community is in Valemount, BC and commenced occupancy on July 6, 2020. Of note, all persons who enter the Valemount Camp Community are temperature tested at the security gate in order to gain entry to the site and then again on exit. The COVID-19 procedures and protocols described in this report apply to all Trans Mountain and Contractor workers regardless of where they reside.

Trans Mountain's second camp community is in Clearwater, BC and is scheduled to commence operations in early October 2020. The same COVID-19 procedures and protocols do and will continue to be applied. COVID-19 Planning for Worker Accommodation

Trans Mountain continues to operate its Valemount Camp with its contracted operators and continues planning for operations of its additional camp communities, is working with regulatory and health authorities and aligning with developing best practices to address the COVID-19 situation. Trans Mountain has engaged the services of a third party qualified medical consultant to assist with COVID-19 planning and response for all construction activities, non-camp accommodations and camp operations. Both BC and Alberta have issued specific requirements and guidance for camp operation. Trans Mountain considers these requirements to be a minimum standard for compliance. Trans Mountain has developed a "Trans Mountain Camp and Accommodations COVID-19 Guideline" (Appendix G). It has been developed in conjunction with the existing Trans Mountain COVID-19 Plan requirements, the recommendations of its medical consultant, health and safety professionals.

Existing and planned worker accommodation by geographic area is summarized in Table 4 below. Each camp community will have an accommodation plan for the development phase of the camp and a COVID-19 plan for the time the camp is in operation. The Valemount Camp Community is operational, and its capacity continues to grow daily as workers enter the area. Currently, work is progressing on development of the Clearwater and Merritt camps. Additionally, preparation for occupancy of Ohamil Camp is also underway.

For Edmonton Terminal and Alberta construction, the majority of the field workforce resides in their own homes, and the home address of each worker is known by the respective organization employing

them. All the necessary protocols have been provided to the workforce including guidelines for procedures for personal time.

The workforce in Jasper and the surrounding area are predominately living in local hotels. TMEP requires its contractors to determine how many are in which towns, in what hotels, and document the cleaning and inspection protocols within the hotels, including the food services. Through its contractors, TMEP also requires and inspects how the workforce is cleaning its equipment and clothing. The workforce is currently being transported and is working as per the Trans Mountain and TMEP Response Plan requirements.

Spread	Camp Community	Approval status	Date required	Beds	Location	Anticipated Occupancy
Spread 1	No camps	N/A	N/A	N/A	N/A	Own or commercial accommodation
Spread 2	No camps	N/A	N/A	N/A	N/A	Own or commercial accommodation
Re- activati on 1	No camps	N/A	N/A	N/A	N/A	Own or commercial accommodation
Spread 3 & 4A	Valemount VAL028	Approved	Operational July 6, 2020	600	near KP 520	Local accommodation for Q4 – 2020- 590, Q1 - 2021- 890(in camp and local accommodation)
	Blue River BLU007	Approved	Potential 2021	550	1.3 km W of KP 610	2021; in the consideration phase
Spread 4B	Clearwater CLE011	Approved	Before late - October 2020	550	1.6 km N of KP 720	Local accommodation for Q2 2020 – 100, July 2020 235 Remainder of 2020 – 750 (in camp and local accommodation Q1 - 2021- 850 (in camp and
Spread 5A	Merritt MER015	Approved	Q1 2021	400	3.1 km W of KP 924	local accommodation) Local accommodation for Q2 2020– 100 Q3/Q4 – 2020 – 565 in local accommodation Q1 – 2021 – 635 (camp and hotel accommodation)
Spread 5B	Ohamil (Leased camp community)	awaiting approval from CER and BCEAO	October , 2020	350	at KP 1055	Q3 2020 – 378 in local accommodation Q4 2020 – 350 in camp and remainder in local accommodation Q1 2021 – 350 in camp and remainder in local accommodation
Spread 6	No camps	N/A	N/A			Own or commercial accommodation
LML Spread 7	No camps	N/A	N/A			Own or commercial accommodation

1 - Camps as approved in September 2017 filing of C 59 - approved A86331-1 - and in September 2017 filing of C 60 - also approved A86331-1

Table 4: Worker Accommodation Summary

#### 4.10.1 Indigenous Accommodation Measures

Trans Mountain's engagement with Indigenous people is ongoing regarding its temporary workforce and a worker accommodation strategy associated with construction activities. In addition to engagement activities with individual groups, Trans Mountain launched a *Circle for Indigenous Involvement* (the Circle) to better understand Indigenous perspectives and involve Indigenous people in the development of solutions that would address the unique interests of Indigenous peoples working on the Project and staying in Trans Mountain accommodations, such as camp communities.

The Circle first met on February 26, 2020 to identify strengths and gaps in the strategy, along with measures to close the gaps. Some early opportunities identified include the retention of a liaison role dedicated as an interface between a camp and local Indigenous community, as well as the development of an Indigenous communication strategy on temporary workforce and worker accommodation. Meetings have been held since the inaugural meeting in May 2020 with the latest meeting providing a virtual tour of ATCO's existing camp community in Fort St. John; this is the second of these virtual tours. In addition, a site tour was held of the Valemount Camp Community, while under construction, in early June 2020.

The intent of the Circle is to continue to meet regularly for continued idea generation as a means to make the Project accommodations meaningful for Indigenous workers, and to have a positive influence and connection with the Indigenous communities impacted by the presence of a temporary workforce.

#### 4.10.2 Contact Information

The majority of the TMEP workforce is hired by Trans Mountain's EPC/GCCs. Due to COVID-19, and in compliance with all privacy laws, Trans Mountain through its contractors will be recording where members of its workforce are living during their time on the Project. This will continue throughout the pandemic and for six weeks after. Public health officials will rely heavily on this information for their monitoring and for any contact tracing investigation, should that become necessary.

To facilitate public health follow-up with symptomatic individuals and those exposed, TMEP/Contractors will maintain a running list of all workforce and visitors on each work site. Visitors include anyone coming on site such as delivery persons, repair persons, etc. This inventory list must be maintained for at least six weeks and must contain:

- Full name and contact information (telephone number, email and physical address) of the individual.
- Name and contact information (telephone number, email and physical address) of the individual's employer.

# 4.11 COMMUNICATIONS

As part of the pandemic protocols, Trans Mountain has in place a communication process to evaluate and determine the types and extent of communication with its workforce, the Contractors, Indigenous communities, stakeholders and the general public if COVID-19 is presumed or confirmed within the workforce.

As with many aspects of the COVID-19 protocols, the situations under which Trans Mountain may need to communicate vary greatly depending on the individual's exposure, who they have come in contact with, the environment where they work and live, and who employs them.

# 4.11.1 Internal Communications

Trans Mountain recognized early that one of the critical responsibilities of the CIST would be to provide accurate, consistent and regular communication to its workforce. In addition to providing COVID-19 updates, there was also a need to ensure the workforce remained calm, safe and productive during the pandemic.

The following workforce communication channels and tactics have been implemented to date:

- Dedicated COVID-19 resource page on the Company's intranet; (more than 12,000 views).
  - COVID-19 resource page was established on January 31, 2020 and has been the main source of information for the workforce.
  - Regular updates with a focus on what's changed.
  - COVID-19 resource page was established June 17, 2020 for "Returning to the Office Safely" this page advises staff on plans, safety protocols and FAQ's for when they return to the office (436 views).
- Dedicated email channel to answer questions from the workforce (over 100 questions answered).
- Monthly President and CEO All-Hands Meetings.
  - o 30-minute update by President and CEO with Q&As from workforce.
  - Follow up survey and/or trailer calls to 10 people, post-meeting, to ask what is working and not working.
- Monday morning President and CEO blog post to all workforce (26 blog posts).
- Dedicated 'Suddenly Remote' resource page on Company intranet (more than 3,500 views). This page is no longer being promoted, but rather a new page called 'Returning to the Office Safely'.
  - Share photos of home office, pets, music listening etc.
  - Resources for Working from Home including productivity tips, mental health and wellness, and exercise. The section has been expanded to include additional health and wellness tips.
- As of July 2020, Trans Mountain introduced a new page called "Returning to the Office Safely" to provide guidance for those returning as part of Phase 1 681 views as of August 17, 2020.
  - Developed a playbook for return to the office in Phase 1.
  - Page has FAQs about Phase 1.
  - Additional resources such as mask usage and guidance.
- Posters and signage.
  - o Safety and prevention protocols available to all staff via downloadable posters online.
- Bi-weekly Leader teleconferences and specific leader messages via email.
  - 30-minute conversations with managers and supervisors to discuss mental wellness, remote working challenges and provide an exchange of ideas and solutions.
- Trans Mountain Care Kits delivered to workforce homes (more than 700 delivered to homes). Promoted sign-up for workers on May 6, 2020. Delivered to workers week of May 18, 2020.

- Letter from the President and CEO mailed to Trans Mountain workforce homes with a Care Kit of reusable cloth masks and hand sanitizer. Additional masks available on the internal Company e-store for purchase.
- Dedicated TMEP COVID-19 Contractor External Site. The site provides Trans Mountain contractors with up to date information about COVID-19 protocols and procedures, including updates and changes.

#### 4.11.2 External Communications

Trans Mountain has assessed the specific situation and determined the best channels for communicating with audiences, taking into consideration how widely the information should be shared and the speed at which the information should be shared. Communications channels being used are:

- direct communication via email, phone calls and or virtual meetings and presentations
- printed materials for landowners, neighbours and stakeholders.
- owned channels
  - transmountain.com;
  - Social channels Twitter, Facebook; and
- news media.

#### Trans Mountain Website

Trans Mountain has a dedicated webpage containing information on its COVID-19 response (<u>transmountain.com/COVID19</u>). This allows for frequent and regular updates that are required to respond to the rapidly changing nature of the pandemic.

Trans Mountain's initial statement regarding COVID-19 was posted on March 17, 2020. Web traffic from March 17, 2020 through to September 22, 2020 is summarized below in Table 5.

Website Activity	Website Activity							
Trans Mountain Web Page	Details	Page views						
COVID-19 Landing Page	transmountain.com/covid19	5,024						
	<u>COVID-19: Maintaining the Health and Safety of</u> <u>our Workforce, their Families and our</u> <u>Communities</u> – Published March 17, 2020	1,649						
COVID-19 Updates	Update: COVID-19 Protocols – Published March 21, 2020	2,581						
	Update: Operations in Light of the COVID-19 Pandemic – Published March 30, 2020	2,246						

Website Activity							
Trans Mountain Web Page	Page views						
	Photos: COVID-19 Measures on the Trans Mountain Expansion Project – Published April 30, 2020	1,150					
	<u>Photos: Trans Mountain Operations COVID-19</u> <u>Measures</u> – Published May 14, 2020	1,166					
COVID-19 Mention	Recap: Burnaby Telephone Town Hall	459					
COVID-19 Report	COVID-19 Report	430* *Count is reflective of the number of clicks from the Trans Mountain website, not from the direct link.					

Table 5: External Website Activity

#### Social Media and E-Newsletters

Important COVID-19 updates are also promoted through the Trans Mountain social media platforms as well as through automated construction update emails and e-newsletters sent to subscribers. Social media activity, construction update emails and e-newsletter distribution between March 19, 2020 and May 22, 2020 is summarized in Table 6. Since May 22, 2020, no new social media posts are specific to COVID-19.

Statements are posted on Twitter - generally the quickest means of broadcasting – if targeted or local media are desired, Trans Mountain can distribute via email to specific community outlets.

Social Media Activity								
Platform	Communication Details							
Twitter (10,847 followers)	<ul> <li>Seven COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>							
Facebook (9,993 followers)	<ul> <li>Six COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>							
LinkedIn (36,675 followers)	<ul> <li>Six COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>							

Social Media Activity					
Platform	Communication Details				
Trans Mountain Today (12,300 subscribers	<ul> <li>Newsletter with links to COVID-19 web content</li> <li>11 e-newsletter issues</li> </ul>				
Community Construction Updates	<ul> <li>For communities with active construction (March 27, 2020)</li> <li>Burnaby: 585 recipients</li> <li>Edmonton: 1,351 recipients</li> <li>Edson: 639 recipients</li> <li>Hinton: 532 recipients</li> <li>Jasper-Mt Robson: 502 recipients</li> <li>Parkland County: 450 Recipients</li> <li>Spruce Grove: 486 recipients</li> <li>Stony Plain: 447 recipients</li> <li>Strathcona County: 530 recipients</li> <li>No new updates have been circulated in May 2020</li> </ul>				

Table 6: Social Media Activity

The Company also has a system that allows for stakeholders to sign up for Community Construction Updates in the form of an e-newsletter; a stakeholder can self-select the geographic area they want to keep up to date on. E-newsletters provide regular construction updates as well as updates on current relevant community issues. E-newsletters are available for the following areas: Burnaby, Edmonton, Edson, Hinton, Jasper/Mt. Robson, Parkland County, Spruce Grove, Stony Plain and Strathcona County. The number of e-newsletters will increase as construction expands.

#### **Notifications**

As part of its regulatory processes, Trans Mountain is required to issue notifications of upcoming work. In addition to details about construction activities, Trans Mountain has added the following language to the notifications sent to Indigenous communities and stakeholders. The language was first included in a Trans Mountain construction notification or background document on March 23, 2020.

With the rapid developments around the COVID-19 situation, our priority continues to be the health and safety of our workforce, their families and our communities. Trans Mountain is following all advice from government and health officials while maintaining the safe construction of the Expansion Project. Trans Mountain will continue to monitor public health guidelines and adjust its plans as required. Project activities are subject to these guidelines, as well as regulatory approvals and permit authorizations. Activities and dates are subject to change.

This content has been included in all construction notifications or background notices issued since March 23, 2020 till present. COVID-19 messaging will continue to be updated and included in future notifications or background notices as appropriate.

# **5** APPENDICES

- A COVID-19 Response Timeline
- B Trans Mountain COVID-19 Response Plan
- C Trans Mountain COVID-19 Self Declaration Questionnaire and Guidance
- D Trans Mountain Site Access Temperature Screening Protocol
- E Trans Mountain Safety Precautions When Working within 2 m of Other Workers
- F Trans Mountain Rapid Response Decision Matrix
- G Trans Mountain Camp and Accommodations COVID-19 Guideline

Appendix A



#### January 15

Emergency Management begins to monitor and understand the COVID-19 (then coronavirus) that is emerging in China and the potential impacts on travel and disease transmission to North America.

#### January 23

First indication that Trans Mountain has employees currently in China to return to the office within the next week, guidance was provided for self-isolation and work-from-home while more information is gathered.

#### January 27

The Corporate Incident Support Team (CIST) was established to understand the emerging pandemic situation and potential impacts. The team also reviewed returning traveler information and provided guidance to supervisors. The team included representation from Human Resources, Health and Safety, Communications Information Technology and Emergency Management.

#### January 31

The COVID-19 intranet site was launched to provide employees/contractors with a source of truth for external resource links and company response.

#### February

The CIST met weekly with additional meetings as needed, and continued to update the intranet site, implemented a communication campaign on hand hygiene and Flu/COVID season specific prevention measures. Communications regarding stay at home if sick were rolled out to the entire workforce. Business Continuity and Pandemic Plan was updated. Participated in industry and government coordination calls.

#### February 27

The CIST formed a recommendation to the Executive to expand the CIST and meet more formally to include additional team members. Response objectives were established:

- 1. Maintain a safe work environment and ensure business continuity
- 2. Ensure regular updates to our stakeholders
- 3. Ensure safe operation of the pipeline
- 4. Ensure safe construction of TMEP

#### March 2

The CIST was expanded to include Legal, and TMEP specific Health and Safety Representative. Pandemic plan was activated at a Level 1. Additonal PPE and cleaning supplies were ordered and plans for distribution were developed along with cleaning protocols and sick worker practices.

Level 1 implementation included:

- Continue to monitor the event and disease progress.
- Maintain normal operating procedures.



- Post guidance documents on Trans Mountain intranet. Providing generic disease information to employees as deemed appropriate.
- Begin non-invasive mitigation measures (wash hands more frequently, distribute hand sanitizer, clean common areas/rooms ore frequently, etc.).
- Communicate government travel advisories to employees.
- Require anyone with flu symptoms to stay at home and to seek medical attention if symptoms become severe.
- Individuals (and family members) returning from locations with Pandemic Influenza outbreaks must discuss return to work procedures with their supervisor.
- Restrict access to vulnerable locations to those who normally report to the location (Control Centre, Westridge)
- Prepare for next level of implementation.

#### March 12

The CIST identified the path to continued safety would be more aggressive physical distancing measures and prepared a plan to implement a work from home plan. The team identified, based on other jurisdictions that working from home was inevitable. The decision was made that Trans Mountain would be better able to handle the change and ensure business continuity, if we planned the office exit rather than have it ordered by a health region. Additional measures of protection were immediately implemented at the Control Centre by removing all non-essential workers from the building.

#### March 15

The increased physical distancing and work from home plan was approved by the executive and the Pandemic Plan was upgraded to Level 2. At this time additional restrictions on travel and in-person meeting attendance were implemented, along with discouraging the use of public transit for all workers.

Level 2 implementation included:

- Continue Level 1 Response
- Begin invasive mitigation measures (limit face to face meetings: reduce use of public transportation, etc.)
- Send out communications to impacted operational districts and head office business units.
- Identify critical functions required to operate at key locations and develop provisions to limit exposure.

#### March 16

Larger response team was established using Incident Command Structure to facilitate the office move out. The COVID-19 CIST Command team began meeting daily to review actions.

	NTACT US: s Mountain Expansion Project	<b>Y</b>	f @TransMtn	youtube.com/transmtn	SOUNDCLOUD	soundcloud.com/transmountain
$\succ$	info@transmountain.com			6025 Sussex Street		
2	1.866.514.6700			PO Box 81018, South Burnaby	y	
<b>P</b>	transmountain.com			Burnaby, BC, V5H 3B0 CANA	DA	



- Westridge Terminal and Control Room restricted to essential personnel.
- COVID-19 Our Response document developed for field staff work guidance for physical distancing.
- Established TM/TMEP COVID-19 EHS Taskforce for coordinated efforts
- Home safety documents developed for Ergonomics, fire and electrical safety.

#### March 19th

90% of Trans Mountain office based workforce was now either working from home or utilizing other remote worksite.

#### March 20th

Pandemic Plan was active at a Level 3. Cross Border emergency response was verified with USA Customs personnel. Review of all operations and TMEP construction activities occurred to determine critical needs.

Level 3 implementation includes:

- Continue with Level 1 and Level 2 Response measures
- Implement aggressive mitigation measures (exercise work from home plans, reduce human interfaces, etc.)
- Prepare for return to normal operations

#### March 23rd

Established a Task Force to combine Operational Health and Safety and TMEP Health and Safety to ensure safety measures being implemented were consistent across operations and construction. The task force worked together to identify PPE needs for both workforces. Critical work tasks were identified where social distancing could not be maintained and procedures developed for close proximity work including the use of respirators for protection. Procedures were developed for worksite access questionnaire and temperature screening. Home office and other remote worksite guidance was created to reinforce Working Alone policies.

#### March 25th

Launch of the "Suddenly Remote" intranet website to support the worforce at home. Resources are posted on a weekly basis including social interations such as pet picture, home office pictures, "caption this" type interactions, resources on mental health supports, financial wellness tips and home ergonomics.

#### March 26th





Control Centre now running split shift between primary and secondary Control Centre limiting personnel in each location to 2-3 individuals.

#### March 30th

Site access temperature screening is implemented at Burnaby, Westridge and Edmonton sites. Additional guidance material was developed including:

#### Working from home safety guidance was developed

- Electrical safety.
- Fire safety.
- Emergency response safety.

#### Home office ergonomics guidance developed

- Each home office set up is different creating individual challenges. Self-assessment guidance posted on Mainline.
- Employees can request to have their office chair delivered to their home.
- Employees can request additional help through email Safety@transmountain.com.

#### April 7

Trans Mountain retained the services of a Medical Doctor to assist in the interpretation of new data and disease progression as well as consult on the development of new procedures being implemented for workforce protection.

#### April 8

Service Now application was launched to replace workforce health data tracking being completed on spreadsheets to gain better data.

#### April 10

Third Control Room established as a back-up in the Central Region Office. This will not run as a split shift, however is a back-up should personnel become ill in one of the other two control centres or one becomes inoperable.

#### April 17

The CIST Command Team continues to meet daily and establish new/modified procedures as new information becomes available. Research beings on leading practices in camp environments. Supply of PPE is evaluated weekly as is the burn rate of these items. Re-entry to the workplace is continually

CONTACT US: 🔰 🖬 @Tr Trans Mountain Expansion Project	ansMtn 🕨	youtube.com/transmtn	SOUNDELOUD	soundcloud.com/transmountain
info@transmountain.com	1	6025 Sussex Street		
<b>1.866.514.6700</b>	-	PO Box 81018, South Burna	by	
🖵 transmountain.com		Burnaby, BC, V5H 3B0 CAN	ADA	



evaluated and procedures are being developed for re-entry including maintaining physical distancing measures for a longer term response.

# April 21

Assessment of 3rd party testing availability and capability begins for incorporation to response plans.

#### April 22

Review of positive case protocol beings and communication procedures along with rapid contact tracing procedures. Review of the provision of non-medical/procedure general use masks is considered for everyday use and the provision of these masks to the workforce.

#### April 29

Implemented a task force to expand the rapid contact tracing program including technology options to ready for back to "normal" and an expanded construction operations and camp accomodations.

#### May 4

Promoted the use of AB TraceTogether application for Trans Mountain workers along with the Government of Canada COVID-19 App and BC Government COVID-19 support application.

#### May 6

Care Kit distributed to all Trans Mountain workers included hand sanitizer and two reuseable face masks for general use outside of the workplace. Detailed return to work planning begins.

#### **May 19**

Finalization of the Rapid Response Tracing procedure to assist in the identification of contacts of potential or confirmed cases of COVID-19.

#### May 21

Updated Fit for Duty Self Declaration Questionnarie for all employees, contractors and visitors to complete prior to accessing any of our field facilities, terminals, control centre, right-of-way work sites and project sites. The Questionnaire was updated to include new questions that align with the most recent provincial health authority information.

#### May 27

Communication to all workers on timeline for intial phased approach to Return to Office (RtO). Phased approach with phase 1 targeted at leaders and those who would like to return to begin in early July.

CONTACT US: Trans Mountain Expansion Project	🄰 🖪 @TransMtn	Þ	youtube.com/transmtn	SOUNDCLOUD	soundcloud.com/transmountain
info@transmountain.com			6025 Sussex Street		
1.866.514.6700		-	PO Box 81018, South Burnat	у	
transmountain.com			Burnaby, BC, V5H 3B0 CANA	DA	



# June 2

Updated temperature screening protocol for sites, and Work from Home information was moved to the internal Suddenly Remote Webpage.

#### June 3

Return to Office (RtO) was communicated to Trans Mountain leaders for July 6 and outline of the phased approach and expectations.

#### June 16

Intranet page launched for RtO information including Safety Plan, Returning to the Office Safely Playbook, guidance material and an area for Frequently asked questions.

#### June 25

Final return plan approved and workers in Phase 1 contacted in regards to their return date and additional required information.

#### June 26

Final approval on safety training for all TM personnel for implementation starting July 6.

#### July 7

Phase 1 Return to Office begins with the successful return of ~30% of office workers to their respective offices.

#### August 26

Announcement of Phase 2 of Return to Office to commence after Candadian Thanksgiving (October 13<sup>th</sup>) and will increase office occupancy to 60%.

#### September 1

COVID-19 Safety training assigned to all remaining workforce.



Appendix B



# **Trans Mountain COVID-19 Response Plan**

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
5	L. Jensen and J. Rose 2020-06-29	R. English and J. Rose 2020-06-29	J. Kereliuk and N. Dunning 2020-07-02	All	Updated Response to align with current Provincial and Federal guidelines

Ī	Trans Mountain	ans Mountain			
		Revision No.:	5		
	COVID-19 Response Plan	Page	2 of 10		

# **Table of Contents**

Trans Mountain COVID-19 – Our Response	3
COVID-19 Response Requirements While at TM and TMEP Sites	3
Communication and Awareness	3
Transportation	4
Site and Site Trailer Cleaning Protocol	4
Hygiene and Personal Protective Equipment	4
Physical Distancing	4
Site Operation	5
Community and Landowner Respect	6
Presumptive Cases	
Return to Work	7
Contractor Response Plans	8
Additional important elements to discuss during tailgate and/or safety meetings	8
Trans Mountain Guidance Documents	9
How to clean and disinfect surfaces	9
Reference information for employees and contractors	9
Appendix A – Trans Mountain Extended Workforce Rapid Response Form	10

	Trans Mountain	Trans Mountain	
		Revision No.:	5
	COVID-19 Response Plan	Page	3 of 10

#### Trans Mountain COVID-19 – Our Response

TM and TMEP are actively monitoring the COVID-19 situation with the help of federal, provincial and local agencies. As the situation evolves, ensuring the health and safety of our workforce remains our top priority. Our go-forward strategy is to implement immediate measures to prevent the spread of COVID-19. We will continue to monitor the situation and take appropriate actions with the following objectives in mind;

- Maintain a safe work environment,
- Minimize the risks of virus spread,
- Ensure the safe operation of the pipeline and maintenance activities, and
- Continued TMEP construction.

While the risk of contracting coronavirus in Canada is considered high, TM and TMEP are monitoring the risks to workers in conjunction with public health agencies and have implemented measures to continue construction. The Public Health Agency of Canada (PHAC) is <u>actively analyzing any potential risks to</u> <u>Canadians on a continuous basis</u>, and Trans Mountain is monitoring any changes in risk status that may occur.

Trans Mountain's Emergency Management team has activated its Pandemic Preparedness Plan and has established an Incident Command System (ICS) structure to monitor and respond to the situation. TMEP is an active part of this ICS structure.

TM and TMEP expects contractors to adhere to their internal health and safety programs as well as any municipal, provincial and federal guidance related to the ongoing pandemic in Canada. TM and TMEP require all contractors and sub-contractors to develop and implement an appropriate pandemic plan, to meet or exceed the requirements of this plan, ensure the health and safety of their workforce and Trans Mountain personnel at all worksites. All plans must be reviewed and approved by TM and/or TMEP. Alternatively, if the contractor chooses to utilize the TM / TMEP COVID-19 Response Plan they must provide written notification to their TM/TMEP contract administrator.

#### **COVID-19 Response Requirements While at TM and TMEP Sites**

TM and TMEP are implementing these COVID-19 response guidelines and precautions effective immediately, to minimize the spread of the COVID-19 virus in our workplaces and the surrounding community.

#### **Communication and Awareness**

- All TM, TMEP and contractors' personnel are reminded of their "Right to Refuse' unsafe work. If any worker feels their work is unsafe, they must discuss this with the Supervisor and discuss further controls.
- All control measures must be discussed and documented during the contractor's daily tailgate safety meeting, or in the absence of a Prime contractor, at the TMEP tailgate meeting and Field Level Risk Assessment (FLRA) process. The FLRA processes must be updated as changes to the work area or conditions occur.
- Contractors must establish a system to verify locations of residence for all personnel while working on shift. Contractors must also establish a method of verification of location while on shift (I.e. mobilization throughout the spread or facilities).
- On-site workers who undertake self-isolation as a result of COVID-19 symptoms must notify site supervision in conjunction with TM/TMEP. Site supervision supported by TM/TMEP must begin contact tracing and notify potentially affected workers to ensure personnel are diligent in monitoring for symptoms. Information should be conveyed in a manner that protects the individual's personal



**COVID-19 Response Plan** 

health information.

#### **Transportation**

- Transportation to and from the worksite should also include physical distancing.
- If personnel must ride in crew trucks or other vehicles together, and if practical and sufficient parking exists, they should limit to 2 people in a vehicle. Individuals should be seated as far apart as possible, wear face coverings, and drive with open windows for the duration of the journey if possible.

Practice safe distancing in vehicles



- Workers should try to travel with the same people every day to minimize virus spread. If using designated work teams, individuals should only travel with those on their team.
- If personnel must travel by bus, maintain a distance of 2m between passengers and add extra busses if possible. Passengers should be limited to one person per bench seat and everyone on board should wear face coverings. Passengers should be staggered from front to back so that no one is sitting directly in front of or behind another passenger. The bus should travel with windows down, weather permitting.

#### Site and Site Trailer Cleaning Protocol

- Sanitize work vehicles and reduce the number of passengers travelling in one vehicle at any given time. Thoroughly clean and disinfect at the end of shifts and between users. Work vehicles include buses, trucks, ATVs, UTVs or any vehicle type.
- Lunchrooms and communal areas must be cleaned thoroughly on a regular basis. Limit access and use of shared devices like coffee machines, water fountains, microwave ovens, photocopiers and similar. Means to clean and disinfect such devices between uses is provided. Create a workplace cleaning schedule and document when an area has been cleaned.
- Jobsites must implement additional cleaning measures of common areas.
- When on-site workers undertake self-isolation as a result of covid-19 symptoms, the site will undertake a deep cleaning of all potentially affected equipment, machinery and communal areas.

#### **Hygiene and Personal Protective Equipment**

- Ensure handwashing is done on a frequent basis in the provided wash facilities. Wash hands often with soap and water for at least 20 seconds after using the washroom, when preparing food, and after blowing nose, coughing, or sneezing. If soap and water are unavailable, alcohol-based hand sanitizer (containing at least 60% alcohol) can be used.
- Follow all other recommended guidelines regarding personal hygiene. If you have to cough or sneeze, do so into a tissue or the bend of your arm, not your hands. Avoid touching your face with unwashed hands.
- Workforce must cleanse their PPE in line with manufacturers recommendations.

#### Physical Distancing

- Where possible, work site is to be segregated to the extent possible in zones or other methods to keep different crews/trades physically separated at all time. This promotes physical distancing and supports the containment of propagation should it arise. The ability to trace the contacts of the separated work crews is critical and a system to do that must be implemented by each contractor.
- Keep your distance from one another at the worksite as well. This includes during informal discussions with co-workers and while physically working.
- Avoid any face-to-face contact and all direct person-person contact (shaking hands) is prohibited.
- The worksite is rearranged to reduce high-traffic areas and allow for the minimum physical



distancing.

- Participants in meetings are required to be mindful of the distance between each other. Maintain at least two arm's lengths (roughly six ft) between one another.
  - Split up meetings into smaller groups to limit exposure to one another (meetings in office settings will be limited to 10 individuals or less depending on the room size).
  - Small site-based meetings must also be encouraged to teleconference or conduct meetings outside of buildings if the weather and environment is conducive to that. This is to minimize contact with infrastructure and air circulating systems.
- Do not pass or share tools, pens, documents, electronics, etc. with other workers.
- One-way staircase use is required wherever practical to minimize worker contact. Wait for staircases to clear of oncoming traffic before using.
- Do not congregate for extended periods in work rooms, job trailers or other areas where people generally socialize.
- Mass gathering restrictions include any gathering that meets or exceeds the mandated limits in alignment with Local, Provincial, and Federal guidelines. The most stringent guideline will be the practice by which TM and TMEP utilize as the standard.
- Reference the Safety Precautions for Working Within 2m of Other Workers guideline if procedures or tasks are unable to be modified to allow for physical distancing.

#### Site Operation

- TM and TMEP personnel, contractors' personnel, and visitors are required to complete the *Trans* Mountain COVID-19 Self Declaration Questionnaire and/or the contractors equivalent form prior to accessing site. Workers who have self-declared as having symptoms or potentially having been exposed to COVID-19 must self-isolate, report to their supervisor and seek testing from the Jurisdictional Health Authority.
  - Workers exhibiting symptoms will be directed to self-isolate as per provincial guidelines and seek guidance from the appropriate Health Authority, and additional cleansing of their work areas completed.
- Clear signage must be posted at entry points on the construction site and outline the commitment to maintain health and safety measures during the COVID-19 crisis.
- Ensure each worksite has potable water, soap, paper towel, and proper garbage disposal. Have alcohol-based sanitizer (containing at least 60% alcohol) available as a temporary solution should wash facilities be unavailable.
- Delivery access points should be limited to receivers and deliverers only. Nothing should be passed between the deliverer and the receiver such as shipping documents or pens.
- Split up coffee/lunch breaks to limit exposure to each other. Eating should be restricted to clearly identified dedicated eating areas with handwashing stations, cleaning and disinfectant materials, and adequate space to maintain minimum physical distancing.
- All sites must refrain from ordering communal food platters and buffets for the workforce.
- Site Supervision and Health and Safety teams must monitor the effectiveness of these plans and enforce the standards contained within.

TRANSMOUNTAINRevision No.:5COVID-19 Response PlanPage6 of 10		Trans Mountain			Trans Mountain Date: 2020-	2020-07-02
COVID-19 Response Plan Page 6 of 10	TRANSMOUNTAIN					
		COVID-19 Response Plan	Page	6 of 10		

#### **Community and Landowner Respect**

- Verify Landowners have been notified prior to any access of their lands.
- Wear appropriate PPE which will include mask and gloves when accessing private lands and sanitize any touch points after completing the work including gates, locks and fences.
   PPE controls are not a replacement for physical distancing.
  - PPE controls are not a replacement for physical distancing.
- Ensure Landowner equipment and property is left clean and sanitized after completing work.
- Dispose of nitrile gloves properly in waste receptacles after leaving the property. When public interaction is indicated, confirm that the appropriate person is communicating and practice physical distancing.
- Use appropriate trash and recycling receptacles for waste products.
- When utilizing community and public facilities, abide by all TM guidelines, procedures, practices and jurisdictional requirements.
- TM / TMEP and Contractor must establish a clear expectation for worker behavior when off duty as
  it relates to COVID-19. Adherence to Trans Mountain requirements for respectful behavior outside
  the work site includes commuting to and from the work site, lodging and while visiting any
  community. Workers must be diligent and prevent the spread of COVID-19 to communities in which
  they reside or visit.
  - Workforce must always minimize interaction with the public outside of work hours and practice physical distancing and good hygiene practices.
- Workers will not visit or otherwise travel to or enter a First Nation Reserve or other Indigenous community, unless it is where they reside, or they have the expressed, written permission from the Authority of that community.

#### **Presumptive Cases**

- Workers must self-isolate if they are sick or show ANY signs of illness, notify their supervisor right away, and seek testing from the Jurisdictional Health Authority (811 or online assessment).
  - Workers are required to self-isolate if they are experiencing flu-like symptoms or any of the symptoms associated with COVID-19 (cough, fever, shortness of breath, runny nose, sore throat, etc.) that is not related to a pre-existing illness or health condition.
  - Personnel who self-isolate or identified as having COVID-19 symptoms, but do not seek testing or are unable to obtain COVID-19 testing, must self-isolate for the required period of time (10 days from the start of symptoms, or until symptoms resolve, whichever takes longer).
  - Workers will seek medical advice and may not self-diagnose or self-determine that their symptoms were unrelated to COVID-19.
- Contractor is required to notify TM/TMEP and complete the *Trans Mountain Extended Workforce Rapid Response Form (Appendix A)* as soon as possible. This form is to be submitted to the TM/TMEP Health and Safety Representative for the work area. The form must then be reviewed immediately and submitted to the designated Initiator as per the Rapid Response Procedure.
  - Follow up information required as the following;
    - Where are they isolating?
    - Does the individual identify as part of an Indigenous or vulnerable community?
    - Have they called 811 or completed an online self-assessment from the Jurisdictional Health Authority?
    - Have they been booked in for a test?
    - Has contact tracing been completed?
    - Identification of close contacts (see definition)
    - What supports have been initiated for the individual while they are isolating?



Date:	2020-07-02
Revision No.:	5
Page	7 of 10

- What immediate actions have been taken?
- What are the individual's accommodations (hotel, rental, etc.) and have they been contacted to notify?
- How many people on site and have disinfection procedures been initiated?
- If a worker who is symptomatic wishes to return to their home in a vulnerable or Indigenous community, the community health centre must be notified to determine that sufficient resources are in place to support isolation of the individual upon arrival.
- In the event of a COVID-19 positive or symptomatic individual is identified and is required to selfisolate away from their home community without opportunity to travel back, the contractor, supervisor or TM/TMEP will arrange to support the individual's isolation requirements and monitor their condition regularly.

#### **COVID-19 Testing**

Negative test

- If an individual receives a negative test, they must sign a confirmation that they have received a negative test from the Jurisdictional Health Authority before returning to site.
- The worker must be symptom free for 24 hours without the aid of symptom relieving medications prior to returning to work.

#### Positive test

- Workers are expected to communicate a positive test result immediately, to their immediate supervisor and Human Resources (as appropriate).
- Positive test results must be communicated <u>immediately</u> by the contractor to TM or TMEP. TM/TMEP will enact the *Trans Mountain Rapid Response Procedure*.
- TM or TMEP will work with the contractor to establish and notify the personnel on site (or off site) who are likely to have been exposed to the COVID-19 positive worker.
  - Workers who are deemed to have been in close contact will be required to leave site, immediately self-isolate, seek testing and monitor for symptoms until a negative test is acquired or the self-isolation period has passed.
  - All workers that were not in close contact but were on site will be allowed to remain on site as long as they pass screening requirements and remain symptom-free.

Close Contact definition:

a) being within approximately face-to-face with suspected/confirmed COVID-19 for greater than 15 minutes in any setting in the period extending from 48 hours before the onset of symptoms; or

b) sharing of a closed space (approximately 6 feet or 2 meters) with a person with suspected/confirmed COVID-19 for a prolonged time (e.g. more than 2 hours) in the period extending from 48 hours before the onset of symptoms; or

c) having direct contact with infectious secretions of a person with suspected/confirmed COVID-19 (e.g. being coughed or sneezed on)

- TM or TMEP, in conjunction with the Contractor, will ensure that all appropriate health authorities are informed and will make the appropriate notifications to government including providing information on contact tracing.
- TM or TMEP will work with contractors and / or health authorities to ensure appropriate community personnel are notified of the case and will communicate with communities as appropriate.

#### **Return to Work**

• To allow for accurate and timely workforce monitoring, if a worker is sent home sick, prior to returning to work they must contact their Supervisor or Trans Mountain representative to coordinate a return to work plan. Return to work plans must include the following considerations;



Date:	2020-07-02
Revision No.:	5
Page	8 of 10

- Signed confirmation that the worker has received a negative test result (from Jurisdictional Health Authority or an affidavit from the worker),
- Self-isolation for the required period of time (10 days from the start of symptoms, or until symptoms resolve, whichever takes longer) or as advised by the Jurisdictional Health Authority, and
- Workers must be symptom free without the use of symptom relieving medications for at least 24-hours prior to return to work.

#### **Contractor Response Plans**

- All TMEP contractors and consulting companies are to complete and implement a COVID-19 response plan to be submitted to the TMEP EHS COVID-19 Response Coordinators and available for review upon request, to meet or exceed the requirements of this plan, it's intent, and include the following at
  - minimum:
    - Mitigative measures implemented and to be implemented in the future to reduce contamination and propagation of COVID-19
    - Response to be taken if someone is identified to be symptomatic on site (develops fever, cough, runny nose unrelated to allergies, etc.) and the supports to be implemented for their isolation period
    - PPE arrangements (direction for use and preparation for escalation of use)
- All TMEP GCC/EPC contractors and direct subcontractors to TMEP are to complete and submit a daily COVID-19 report to appropriate TMEP Project Manager, TMEP Health and Safety Lead, and TMEP EHS COVID-19 Response Coordinators
  - to include the following information;
  - Daily statistics (inclusive of reporting sub-contractors) of active, isolated (illness unrelated, suspected, or confirmed COVID-19 cases), working from home (may or may not be isolated personnel), and persons who identify as First Nations or Indigenous descent who report the following;
    - declare or display symptoms of illness;
    - been directed to self-isolate and undergo testing; and
    - have tested positive for COVID-19. (If worker is tested and a confirmed positive case, it must be reported immediately)
  - o Current mitigative measures in place
  - Crew locations for the following workday

#### Additional important elements to discuss during tailgate and/or safety meetings

- **Refresh on all key safety risks.** COVID-19 is not the only workplace hazard present. Stay focused on the task at hand– remind the team that inattention is often a factor in injuries from routine activities.
- **Discuss issues with hospital visits and emergency response given the current situation.** Even relatively minor injuries that need medical attention could be delayed by an already taxed system, which is even more reason to be careful.
- Watch out for those around you. Some people are more affected by this situation. Please watch out for those around you who may be distracted, especially when performing tasks that could impact you or several others.
- **Discuss information on COVID-19 testing and contact tracing.** Alberta and British Colombia Jurisdictional Health Authorities have made testing assessments available via 811 phone call and online. Each province also has developed mobile phone applications for additional resources and

Alberta has developed contact tracing functionality.

#### **Trans Mountain Guidance Documents**

- Trans Mountain COVID-19 Self-Declaration and Guidance
- Trans Mountain Site Access Temperature Screening Protocol
- Trans Mountain Safety Precautions When Working Within 2m of Other Workers Guideline
- Trans Mountain Extended Workforce Rapid Response Form (Appendix A)

Inquiries, questions or concerns about these documents may be directed to your field safety advisor.

#### How to clean and disinfect surfaces

As stated above, all frequently touched worksurfaces, vehicles and communal areas must be washed and sanitized thoroughly throughout the workday on a regularly scheduled basis. The provisions required for cleaning must be provided by the company or contractor and resupplied as necessary. All door handles, railings, ladders, switches, controls, eating surfaces, shared tools and equipment, taps, toilets, and personal workstation areas should be wiped down at least twice a day with a disinfectant, such as disinfectant wipes. Individuals are responsible for cleaning and disinfecting their workstations. All cleaning and disinfecting should be carried out as per PHAC's recommendations:

www.canada.ca/en/public-health/services/publications/diseases-conditions/cleaning-disinfecting-public-spaces.html

- Wear disposable gloves when cleaning and disinfecting surfaces.
- Put used gloves in the garbage after each use.
- Clean hands immediately after gloves are removed.
- Reference all applicable SDS for cleaning products used.
- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection purposes, mix 1/3 cup of bleach to 1 gallon of water to create a solution for sanitizing surfaces throughout the work site.
- Wear safety glasses when cleaning with solvents.

#### **Reference information for employees and contractors**

For general questions about the COVID-19 situation related to Trans Mountain activities, please contact your Supervisor or Trans Mountain Representative.

- <u>Trans Mountain External Website</u> (request access through contract administrator)
- <u>Twitter</u>



# Appendix A – Trans Mountain Extended Workforce Rapid Response Form

Contracting Company Name:		TM Health and Safety		
Site Manager/Supervisor Name:	Representative Name:			
TM Project Manager Name:		Worksite Location:		
How many people are on the site	?			
Where is the individual for self-is	olation?			
What are the accommodation arran	igements (hotel,	rental, etc.)?		
Have they been notified?			□ Yes	🗆 No
Is the individual a member of Community? If yes, which one?	_		e □Yes	□ No
If yes, does the individual commute	to/from the site	and the community?	□ Yes	□ No
Have they been tested for COVID	-19?		□ Yes	□ No
If the individual has been tested, do they have the results?				□ No
If the individual has been tested but	t does not have t	he results, when are the result	ts expected?	?
If the individual has not been tested	l, has a test beer	scheduled?	□ Yes	□ No
How many people are potentially	considered "cl	ose contacts" of the individu	ual?	
Where are those people now?				
What is the site doing for sanitization, physical distancing?				
What Immediate Actions have be	en taken?			
Is there a return to work plan?			🗆 Yes	□ No
If yes, what is it?				
If no, when can it be expected?				

Appendix C



#### Trans Mountain COVID-19 Self-Declaration Questionnaire

Due to the ongoing and rapidly changing situation with the novel coronavirus (COVID-19), and to ensure fitness for duty, Trans Mountain is requiring **all employees, contractors, and visitors** ('individuals'') to complete a self-assessment/declaration questionnaire prior to accessing the company offices, facilities or right-of-way (ROW) project sites.

COVID-19 is believed to be spread mainly by coughing, sneezing or direct contact with someone who is sick with COVID-19. Transmission can also occur when a person infected with COVID-19 touches a surface and other people subsequently touch the same surface; the virus can survive on some surfaces for extended periods of time.

#### **Completing the Questionnaire**

All Individuals must complete the attached self-declaration before being granted access to a Trans Mountain office, facility or right-of-way.. Individuals may retain the same copy of the form. A new form will be required to be completed if an individual's condition (symptoms develop) changes or a new version of this form has been issued by Trans Mountain. The information collected will be for the sole purpose of determining fitness for duty.

Any individual who does not complete this declaration will be refused access to Trans Mountain property and worksites.

Completing this questionnaire does not preclude COVID-19 physical distancing practices or exercising mitigation protocols (i.e. sanitation practices, proper hygiene, PPE, etc.) while working at a Trans Mountain worksite.

If an individual answers yes to any of the questions below, they must immediately notify their supervisor and/or their Trans Mountain site representative. At this time, the individual may be denied access or be required to leave the worksite.

#### At all Trans Mountain worksites (terminals, pump stations, right-of-way dig sites, etc.)

- Individuals reporting for work at a Trans Mountain worksite must complete the attached selfdeclaration questionnaire prior to accessing the worksite.
- This document must be shown and be evaluated by Trans Mountain site security, a Trans Mountain Representative, a First Aid attendant, and/or a third-party Temperature Monitor (as appropriate) to ensure fitness for duty and gain clearance to work. When requested, show the completed form to the requestor but **do not hand the form over as this is a potential virus transmission pathway.**
- This form must be kept on the individual at all times and be available for display upon request.
- At any time if your condition changes, a new form must be completed and reviewed by a Trans Mountain representative.

If contractors have implemented a similar questionnaire, they may use their own form provided it meets the intent and requirements of the Trans Mountain COVID-19 Self Declaration Questionnaire. Contractor documents are subject to review by Trans Mountain personnel.

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
5	R. English 2020-06-29	R. English and J. Rose 2020-06-29	R. English and N. Dunning 2020-07-02	All	Updated to include office language, feedback from Legal and aligned with new provincial social gathering guidelines.


# TRANS MOUNTAIN COVID – 19 SELF DECLARATION QUESTIONNAIRE

YES NO

Worker Name:	Company:	
	company.	

IMPORTANT: Please note that the completion of this questionnaire, <u>prior</u> to mobilization to site, is required by Trans Mountain in order to assess your fitness for work:

In the last 14 days, have you;	YES	NO
Previously tested positive for COVID-19 or been recommended to self-isolate by a health professional?		
In the last 48 hours, have you or are you currently displaying any symptoms such as;	YES	NO
Chills, repeated shaking with chills, muscle or joint aches		

Feeling unwell in general, new fatigue or severe exhaustion Nausea, vomiting, diarrhea, unexplained loss of appetite Conjunctivitis (pink eye)

In the last 14 days, have you or are you currently displaying any symptoms such as; Fever (body temperature in excess of 100.4 degrees F or 38 degrees C) Cough, runny nose/stuffy nose (unrelated to allergies) Sore throat, painful swallowing Difficulty breathing, chest pain, shortness of breath

New loss of taste or sense of smell

Pneumonia (infection of the lungs)

In the last 14 days, have you;	YES	NC
Travelled outside of Canada?		
Been in contact with a person who returned to Canada in the last 14 days?		
Been in contact with a person who became ill after returning from any international travel?		
Been in contact with a person who is suspected to have presumptive COVID-19 symptoms or has been diagnosed with COVID-19?		
Or anyone you live with, been in contact with any person who has an undiagnosed respiratory illness or is being tested for COVID-19?		
Visited a home and/or health care facility <u>where you have been notified of potential exposure</u> to positive cases of COVID-19?		
Have you been in close contact with a household member who is ill and has presented flu-like symptoms (cough, sore throat, fever)?		
Close Contact definition:		
a) being within approximately face-to-face with suspected/confirmed COVID-19 for greater than 15 minutes in any setting in the period extending from 48 hours before the onset of symptoms; or		
b) sharing of a closed space (approximately 6 feet or 2 meters) with a person with suspected/confirmed COVID-19 for a prolonged time (e.g. more than 2 hours) in the period extending from 48 hours before the onset of symptoms; or		
c) having direct contact with infectious secretions of a person with suspected/confirmed COVID-19 (e.g. being coughed or sneezed on)		
Have you attended any mass gatherings in which attendance exceeded the Provincial maximum allowances, come into close contact (as per definition) with non-household members not wearing appropriate PPE, played team sports, etc. while off work on personal time? that may not be consistent or compliant with Trans Mountain Covid-19 procedures and/or all current directives from government and health authorities?		

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
5	R. English 2020-06-29	R. English and J. Rose 2020-06-29	R. English and N. Dunning 2020-07-02	All	Updated to include office language, feedback from Legal and aligned with new provincial social gathering guidelines.



# TRANS MOUNTAIN COVID – 19 SELF DECLARATION QUESTIONNAIRE

- 1. <u>The information that I have provided above is true and correct. I will advise Trans Mountain immediately of any changes to this information. I understand that intentionally providing false or misleading information, or my failure to immediately update any changes to the information provided, may lead to disciplinary action against me.</u>
- 2. I agree that I will comply with all Trans Mountain Covid-19 procedures
- 3. <u>I agree that as a condition of my attendance at Trans Mountain offices and/or worksites, I will comply with all Trans Mountain Covid-19 procedures in addition to all relevant government and health authority directives when onsite or offsite Trans Mountain facilities. I agree to provide all required information on close contacts that could be affected while at Trans Mountain facilities or externally when I am engaged in activities for Trans Mountain in the case of my positive or suspected COVID-19 diagnosis.</u>
- 4. <u>I agree that if my health status is changed relating to COVID-19, I will inform my employer, Trans Mountain and Health Authorities.</u>

Worker Signature

Date

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
5	R. English 2020-06-29	R. English and J. Rose 2020-06-29	R. English and N. Dunning 2020-07-02	All	Updated to include office language, feedback from Legal and aligned with new provincial social gathering guidelines.

Appendix D



# Trans Mountain Site Access Temperature Screening Protocol

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
3	R. English 2020-08-28	J. Rose & R. English 2020-08-28	J. Kereliuk & N. Dunning 2020-08-28	All	Revised Flowchart Removed secondary screening for low temperatures



Trans Mountain Site Access Temperature Screening Protocol

Date:	2020-08-28
Revision No.:	3
Page	2 of 7

## **Table of Contents**

1.0	Introc	luction	3
	1.1	Definitions	3
	1.2	Scope	3
2.0	Prior	to Arriving at Site	
	2.1	Self-Assessment	
3.0	Temp	erature Screening	4
	3.1	Risk Based Decision Making	5
		3.1.1 Risk Based Temperature Screening Flow Chart	6
	3.2	Self-Temperature Monitoring	
	3.3	Refusal of Temperature Screening	7
4.0	Third	Party Temperature Screening	
		Personal Protective Equipment	
5.0		ing	

#### **1.0 INTRODUCTION**

#### 1.1 Definitions

- Fever A body temperature measured to be above the normal (37°C or 98.6°F) by a thermometer or other temperature recording device. In practice, a person is not considered to have a fever until their temperature reaches or exceeds 38°C (100.4°F). As per <u>HealthLink BC</u>, <u>HealthLink AB</u>, and <u>Washington State Department of Health</u>.
- **High Grade Fever** A body temperature measured at or above 39.4°C (103°F). A person with a fever at this temperature should seek immediate medical attention.
- Personal Protective Equipment (PPE) Protective equipment worn to limit exposure potential to hazardous infectious disease. PPE includes procedural masks and/or government recommended face and respiratory protection, nitrile gloves, and a face shield or close-fitting safety goggles. It is recommended that the Temperature Monitor wear a disposable water-resistant long-sleeve coverall or gown.
- Third Party Temperature Monitor (aka Temperature Monitor) The person designated to administer temperature screening and review self-assessment questionnaires at the site entry point.

#### 1.2 Scope

Establishes a protocol for screening for the occurrence of fever symptoms present in Trans Mountain employees, contractors, and visitors. This document has been established to work in conjunction with all other Trans Mountain COVID-19 plans, procedures, protocols, and guidances, such as the following;

- Trans Mountain COVID-19 Response Plan
- Trans Mountain COVID-19 Self-Declaration and Guidance
- Trans Mountain Safety Precautions When Working Within 2m of Other Workers Guideline

This screening is being conducted to identify if an individual has a body temperature above 38°C (100.4°F), which often indicates that the body is fighting an infection.

The requirement to have dedicated on site access temperature screening is risk based considering number of people, footprint of work area, and type & frequency of activities that would impede on physical distancing. For a worksite with a high concentration of people in a defined footprint, a risk-based approach needs to be taken to identify level of risk to all workforce and implement corresponding mitigation, including potential third-party temperature screening.

At locations where third-party temperature monitoring services are not feasible or accessible, there is a requirement to self-monitor personal temperature as part of the Trans Mountain COVID-19 Self Declaration Questionnaire (or Contractor equivalent).

There must be temperature testing made available to workers for voluntary screening prior to departing the work site.

All personnel that determine that they may have developed a fever or symptoms while on the work site the worker must report this immediately to their Supervisor and in turn, the Contractor report this to TM/TMEP, and the Contractor arrange to have their temperature taken prior to departing the work site as part of their assessment.

Any temperature determined to meet or exceed the fever threshold must be immediately reported to their supervisor. At the time of this notification, the supervisor must immediately notify TM /



TMEP and fill out the Rapid Response Form included as Appendix A of the *Trans Mountain* COVID-19 Response Plan.

#### 2.0 PRIOR TO ARRIVING AT SITE

#### 2.1 Self-Assessment

Workers and visitors are mandated to complete the *Trans Mountain COVID-19 Self Declaration Questionnaire,* or equivalent, which includes assessing the workers' health and wellbeing for the following infection indicators;

- Difficulty breathing or shortness of breath.
- Chest pain.
- Cough.
- Sore throat.
- Fever.
- Close contact in the last 14 days with a person with a confirmed diagnosis of an infectious disease (i.e. COVID-19).
- Return from travel abroad (including the United States) in the last 14 days.

The form <u>must</u> be completed prior to arrival at site and reviewed by the designated Temperature Monitor (if this is in place). No transfer of the form will occur to minimize the spread of infectious disease and a picture of the document or electronic form can be used.

If a worker/visitor answers yes to any of the questions on the questionnaire, they must immediately notify their supervisor and/or their Trans Mountain site representative. At this time the worker/visitor may be denied entry to site based on a fitness for work evaluation. Any employee, contractor, or visitor who does not complete the *Trans Mountain COVID-19 Self Declaration Questionnaire* (or equivalent) will be refused access to Trans Mountain property or worksites.

#### 3.0 TEMPERATURE SCREENING

All temperature screenings to occur on Trans Mountain sites will occur by the following guidelines;

- To minimize contamination, thermometers with disposable single use covers or noncontact temperature recording devices will be used and will be wiped down with a sanitizing wipe after each use as applicable.
  - For usage of any temperature recording device, individuals being tested must wear PPE in accordance with manufacturer's instructions.
- The Temperature Monitor must wear the appropriate PPE; including a procedural masks and/or government recommended face and respiratory protection, nitrile gloves, and a safety goggles or face shield. It is recommended that the Temperature Monitor wear a disposable water-resistant long-sleeve coverall or gown.
- Personnel being tested by a temperature monitor must wear a mask where physical distancing cannot be maintained.
- A temperature at or above 38°C or 100.4°F will be considered the threshold for fever (variances on the temperature device as per the manufacturer specifications shall be followed).
  - If the temperature reading is above the normal range (38°C 39°C or 100.4°F-102.2°F), the worker/visitor shall have a retest to verify temperature, waiting time shall be dependent on environmental conditions, device utilized and the decision



of the temperature monitor (e.g. 5 to 15-minute waiting period) before a retest. While the worker/visitor waits for the retest the worker/visitor must wear a mask or practice physical distancing protocols until the retest occurs. If the temperature is above 38°C or 100.4°F after the retest has occurred, the worker/visitor must supervisor Trans Mountain site contact their and representative (Supervisor/Manager) and shall be denied access to site. In the event that this occurs. the individual will be directed to work with their supervisor in seeking medical advice and self-isolate until it can be determined that the symptoms are unrelated to COVID-19.

- Individual's with a temperature registering as a high-grade fever will be directed to seek immediate medical attention and their supervisor will be notified immediately.
- Only thermometers or temperature recording devices intended for human use will be used.
- The Temperature Monitor will ensure that the device is used appropriately according to the user manual. This manual must be available at place of temperature testing.
- A competency evaluation for all persons tasked with temperature screening that demonstrates:
  - The Temperature Monitor understands and correctly applies the site access temperature screening procedures established by Trans Mountain, and,
  - The results are reproducible and are within the error of margin specified by the thermometer manufacturer,
  - o Include minimum requirements of a sign-off or test to demonstrate competency.

#### 3.1 Risk Based Decision Making

All terminals, laydown yards and work camps will require temperature testing. All other worksites will need to follow a risk-based approach and refer to the decision flow chart in Section 3.1.1 of this protocol to determine if temperature screening is required. Risk based decisions must consider the following;

- Is it a defined work area?
- Does the onsite work last more than 3 days?
- Will there be more than 20 people onsite simultaneously?
- Will the worksite area limit the ability to practice physical distancing?

Other factors to consider:

- Will there be close-proximity work being performed on site?
- Will there be more than one work group (i.e. contractors) on site?
- Will there be multiple jobs being performed on site?



Date:	2020-08-28			
Revision No.:	3			
Page	6 of 7			

#### 3.1.1 Risk Based Temperature Screening Flow Chart





#### 3.2 Self-Temperature Monitoring

- Only thermometers or temperature recording devices intended for human use will be used.
- Manufacturer's specifications shall be followed.

#### 3.3 Refusal of Temperature Screening

If a worker/visitor refuses to be scanned, the workers supervisor will be contacted, and the worker/visitor will be denied entry to site.

#### 4.0 THIRD PARTY TEMPERATURE SCREENING

All procedures developed by third-party companies contracted to perform temperature monitoring will adhere to this guideline at a minimum.

Temperature monitoring areas must be established that allow for efficient flow of personnel to be screened, while maintaining physical distance and hygiene practices.

All temperature monitoring devices must be intended for human use.

#### 4.1 Personal Protective Equipment

The third-party contractor is to provide all PPE required for the Temperature Monitor and assessment, and shall provide the required training for use, care and maintenance.

• A procedure for donning and doffing PPE must be developed prior to starting work. All donning and doffing of PPE by the Temperature Monitor will follow the established procedural guidelines.

#### 5.0 TRACKING

It is the responsibility of the Third-Party Temperature Monitor and/or Contractor to notify TM/TMEP of any individuals that have that have identified as to having a fever. The Contractor shall report all isolations/screening failures, or where any one has identified symptoms to TM / TMEP <u>immediately</u> so that TM/TMEP can enact the Trans Mountain Rapid Response Procedure, as required. All personal information must be kept in a confidential manner.

Appendix E



# Trans Mountain Safety Precautions When Working Within 2m of Other Workers

Revision	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
4	L. Jensen and C. Topolniski 2020-08-28	J. Rose & R. English 2020-08-28	J. Kereliuk & N. Dunning 2020-08-28	All	Revised to reflect appropriate usage of cloth face coverings Integrated Safe Work in Close Proximity Decision Flow Included imperial measurements



#### This guidance may only be used after approval has been given by the responsible Trans Mountain supervisor and in consultation with a Health and Safety Advisor.

Physical distancing rules **must** be followed at all times on all Trans Mountain worksites, and when within camps and accommodations. This guidance document is to be used only for rare situations where physical distancing rules cannot be followed.

The key to prevention and protection against COVID-19 for the general worker population remains physical distancing, disinfection and hygiene practices, such as washing your hands frequently and not touching your face, especially your nose, mouth and eyes.

#### When Working Within 2m (6 ft) of Other Workers

Although physical distancing rules <u>must</u> be followed at our worksites and camps, it is understood that this is not always possible. If all other scenarios to complete the task or manoeuvre around the camp have been considered and physical distancing cannot be maintained, the following measures must be implemented anytime workers and camp guests will be within a 2m (6ft)proximity of others.

- Prior to arriving at the worksite or camp, all workers are required to complete a Trans Mountain COVID-19 Self Declaration Questionnaire (or contractor equivalent) and retain a copy on their person for display whenever requested.
- On site temperature screening may be implemented at sites to add an additional level of safety as required by the Trans Mountain Site Access Temperature Screening Protocol.
- Post appropriate signage that limits the number of occupants in a restricted area (confined space, pipeline excavation, welding area, pig launcher/receiver platform, etc.). i.e. **PERSONNEL RESTRICTIONS IN EFFECT**
- Working in close proximity must be reviewed at every tailgate meeting, reminding workers to be mindful of the additional risks this presents when working within 2m (6 ft) of other workers. Tailgate meetings can be done electronically whenever possible to limit physical interactions.
- Face coverings are required, in addition to appropriate location and/or task-specific PPE.
- Cloth face coverings must:
  - Fit snugly but comfortably against the side of the face
  - Completely covers the nose and mouth
  - o Be secured with ties or ear loops
  - o Include multiple layers of fabric
  - Allow for breathing without restriction
  - Be laundered regularly and machine dried without damage or change to shape
- Cloth face coverings may only be used in the event that a particulate filtering face mask (N95, P100 respirator) or Self Contained or Supplied Air respirator is NOT required based on the workplace hazard assessment (hazardous atmosphere).
  - The workers are to be familiar in how to wear, remove and dispose of face coverings, including performing good hand hygiene (washing hands with soap and water for at least 20 seconds) before fitting the face covering and after taking it off. Face coverings also need to be maintained or replaced where necessary and stocked correctly.

#### Safe Work in Close Proximity Decision Flow



#### **COVID Personal Protective Equipment Care**

- All workers must be familiar in use and care and follow donning and doffing practices.
- Workers must not share PPE.
- PPE laundering:
  - If worker coveralls become contaminated with another person's bodily fluids, they must be removed and cleaned following standard laundering guidelines.
  - Facial coverings must be taken out of service and cleaned regularly according to manufacturer's instructions and must be changed daily or if it becomes soiled and/or visibly contaminated.
- All hard surfaces must be sanitized with a Health Canada approved cleaning agent. (For additional sanitizing information reference the *Trans Mountain COVID-19 Response Plan*).
- Immediately cease work and evacuate workers from the general vicinity if the workplace becomes contaminated with bodily fluids (blood, saliva, mucus).
   When working with tools and equipment minimize dual contact wherever possible and use tools requiring only one operator.

Appendix F



# CAMP AND ACCOMMODATIONS COVID-19 GUIDELINE

# 01-13283-GG-0000-HS-GDL-0003

Rev	Prepared by/	Reviewed by/	Approved by/	Pages	Remarks
No.	Date	Date	Date	Revised	
1	L. Jensen 2020-07-07	J. Rose, N. Dunning & Dr. K. Jenkins 2020-07-07	C. Jenkins 2020-07-07	All	New Document



#### CAMP AND ACCOMMODATIONS **COVID-19 GUIDELINE**

Date:	2020-07-07
Revision No.:	1
Page	2 of 19



#### CAMP AND ACCOMMODATIONS COVID-19 GUIDELINE

## CONTENTS

1	De	finitions and Acronyms5						
	1.1 Definitions							
	1.2	Acro	onyms	6				
2	Intr	roduc	oduction					
	2.1	Ove	Oversight					
	2.2	Pur	pose	7				
	2.3	Sco	pe	7				
3	Ge		neral Requirements for accommodations					
	3.1	Role	es and Responsibilities					
	3.1	.1	Director, Health and Safety, TMEP	7				
	3.1	.2	Camp or Accommodations Manager	7				
	3.1	.3	Infection Prevention and Control Coordinator	8				
	3.1	1.4 Accommodations Coordinator		8				
	3.1	.5	Occupational Health Practitioner (OHP)	8				
	3.1	.6	Housekeeping/Food Services Contract Provider	9				
3.1		.7	Camp Worker Supervisors	9				
	3.1	.8	Occupants	9				
	3.2	Site	Access Controls1	0				
	3.2	2.1	Self-Monitoring1	0				
	3.2	2.2	Health Screening Access Point1	0				
	3.3	CO	VID-19 Notifications1	1				
	3.4	Con	ntact Tracing1	1				
	3.5	Out	break Management Plan1	1				
	3.6	Ter	minating COVID-19 Measures and Response1	2				
4	No	n-Car	mp Accommodations Specific Requirements1	2				
	4.1	Acc	ommodation Options1	2				
	4.2	Sus	pected and/or Presumptive COVID-19 Case1	3				
	4.3	Isolation						
5	Ca	mp S	pecific Requirements1	4				
	5.1	Site	Access	4				
	5.2	Site Preventative Measures1	4					
5.2.1 Hygiene								



5.2.2	Safety reminders	15
5.2.3	Cleaning	15
5.2.4	Food Service and Hygiene Practices	
5.2.5	Physical Distancing Practice Implementation	17
5.3 Isol	ation and Quarantine Requirements	17
5.3.1	Waste Management for ill Workers	
5.3.2	Monitoring Close Contacts	
5.3.3	Notifying the Health Authority of an outbreak	
5.4 Co	ordination with Work Site Contractor	



## 1 DEFINITIONS AND ACRONYMS

#### 1.1 Definitions

**Close Contact**: Someone who has met one or more of the following criteria;

- a) being within approximately face-to-face with suspected/confirmed COVID-19 for greater than 15 minutes in any setting in the period extending from 48 hours before the onset of symptoms; or
- b) sharing of a closed space (approximately 6 feet or 2 meters) with a person with suspected/confirmed COVID-19 for a prolonged time (e.g. more than 2 hours) in the period extending from 48 hours before the onset of symptoms; or
- c) having direct contact with infectious secretions of a person with suspected/confirmed COVID-19 (e.g. being coughed or sneezed on).

**Confirmed Case**: A person with laboratory confirmation of the infectious disease, irrespective of clinical signs and symptoms.

**Epidemic**: The occurrence of more cases of disease than expected in a given area or among a specific group of people over a particular period of time.

**Exposure Criteria:** In the 14 days before onset of illness, a person who:

- traveled to an affected area (including inside Canada); OR
- had close contact with a person with acute respiratory illness who traveled to an affected area (including inside Canada) within 14 days prior to their onset of illness; OR
- participated in a mass gathering identified as a source of exposure (e.g., conference); OR
- had laboratory exposure to biological material (e.g. primary clinical specimens, virus culture isolates) known to contain COVID-19.

**Infectious Disease**: A disease that is caused by a microorganism, such as a bacterium, virus, or protozoan, that is not normally found in the body and is capable of causing infection.

**Isolation:** The process of separating sick people with a contagious disease from people who are not sick.

Occupational Health Practitioner: An individual who-

- a) is a medical practitioner, a nurse practitioner, or a registered nurse; and.
- b) has the knowledge, experience, and skills in occupational health to carry out a task required by regulations.

**Pandemic**: An epidemic occurring over a very wide area (several countries or continents) and usually affecting a large proportion of the population. (US Centre for Disease Control and Prevention).

**Probable/Presumptive Case**: An individual who is ill and has been to take a COVID-19 test but does not yet have the results.

**Quarantine**: The process of separating and restricting the movement of people who were exposed to a contagious disease to determine if they become sick.



**Suspect Case**: An individual who is experiencing the symptoms of the infectious disease and/or has been exposed to a positive case of COVID-19 but has not yet been tested.

**Workforce:** All individuals supporting or working on the TMEP, directly or indirectly, including, but not limited to, TMEP Employees, Contractors, Subcontractors and any accompanied visitors to the Project or Project Work site.

#### 1.2 Acronyms

BC	British Columbia
BC CDC	British Columbia Centre for Disease Control
BC PHO	British Columbia Public Health Order
CEEP	Contractor Environmental Execution Plan
CHSMP	Contractor Health and Safety Management Plan
CIST	Corporate Incident Support Team
COVID-19	Coronavirus Disease 2019 (aka SARS-CoV-2)
DIN	Drug Identification Number
OHP	Occupational Health Practitioner
PHAC	Public Health Agency of Canada
PHO	Public Health Order
PPE	Personal Protective Equipment
PSSP	Project Specific Safety Plan
SSERP	Site-Specific Emergency Response Plan
TMEP	Trans Mountain Expansion Project

## 2 INTRODUCTION

#### 2.1 Oversight

The BC Office of the Provincial Health Officer, WorkSafe BC, and in one of the sections of the Trans Mountain COVID-19 documents, provide guidance to which all Camp or Accommodations' COVID-19 plans must meet or exceed. The most current iteration of the following Public Health Orders, WorkSafe BC guidance, and Trans Mountain COVID-19 documents must be applied as the standard;

- BC Order of the Provincial Health Officer Industrial Camps
   <u>https://www2.gov.bc.ca/assets/gov/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/covid-19/covid-19-pho-order-industrial-camps.pdf</u>
- WorkSafe BC COVID-19
   <u>https://www.worksafebc.com/en/about-us/covid-19-updates/health-and-safety</u>
- Trans Mountain COVID-19 Response Plan
- Trans Mountain COVID-19 Self Declaration Questionnaire and Guidance
- Trans Mountain Site Access Temperature Screening Protocol
- Trans Mountain Safety Precautions When Working Within 2m of Other Workers



#### 2.2 Purpose

The objective of this document is to ensure the proper steps are taken to reduce the risk of an actual outbreak or in the event of an actual outbreak of the COVID-19 virus on Trans Mountain Expansion Project (TMEP). This document will be applied as the minimum standard for COVID-19 and does not replace appropriate documents under contract (CEEP, PSSP, SSERP, CHSMP, etc.). There are inherent risks with workers who work and live in close proximity. These risks include the risk of infection or injury due to exposure to bodily fluids and communicable disease while providing care to injured and ill workers. The health of everyone working for TMEP, their families and the communities in which they are working, and living is paramount. The key aspects of the prevention and containment of a pandemic threat at an industrial camp or alternate accommodations include:

- Site Access Control;
- On-Site Preventative Measures;
- Preparation for possible confirmed case;
- Reporting and Assessment Mechanism for Suspect Cases;
- Quarantine and Case Measures; and
- Terminating COVID-19 Measures and Response

#### 2.3 Scope

This guideline applies to all Contractors operating camps and/or accommodation housing, of personnel working on the TMEP. All Camp and/or Accommodations COVID-19 plans must meet or exceed the requirements and intent of this guideline. Accommodations outside of camps housing significant numbers of workers include mass bookings of hotel rooms.

### **3 GENERAL REQUIREMENTS FOR ACCOMMODATIONS**

#### 3.1 Roles and Responsibilities

#### 3.1.1 Director, Health and Safety, TMEP

- Issue this procedure to all camp providers and Contractors engaged on the TMEP using other accommodations providers (e.g. hotel) as the overall minimum standard which they must prepare to meet or exceed.
- Work with Camp Operators to identify essential staff required during the health epidemic and initiate emergency measures as required.
- Work with the Trans Mountain Corporate Incident Support Team (CIST) to ensure active surveillance of alerts from local and regional level and communicate information to the Project personnel.

#### 3.1.2 Camp or Accommodations Manager

- Where operating a camp, implement Camp Medical and Health Services plans inclusive of supporting documents, such as Pandemic Response Plan or Camp/Accommodations COVID-19 Plan and all associated health and safety requirements.
- Where operating alternative mass accommodations, develop and implement an Infection and Prevention Procedure.



TRANSMOUNTAIN

- Ensure availability of sufficient resources to implement plans, maintain standards; and position an Infection Prevention and Control Coordinator.
- Ensure availability of backup health clinic personnel in the event of attending Occupational Health Practitioner falls ill and/or when additional staff required.
- Notify housekeeping/food services provider of outbreak or potential outbreak and have them initiate their response plan.

#### 3.1.3 Infection Prevention and Control Coordinator

- Appointed by the Camp Operator, or for instances of hotel accommodations, by the Contractor.
- Responsible for oversight of the implementation of the procedure.
- Provides liaison between Prime Contractors medical resources and any other medical resources with the TMEP Project leadership team, including Camp Operators.
- Ensures worker/personnel educational requirements are met.
- Inspects hygiene measure requirements and cleaning standards.
- Inspects camp accommodations and resources to ensure proper practices including physical distancing and respiratory protection are being used.
- Supports communication between medical personnel and the Jurisdictional Health Authorities.
- Provides support to personnel and contractor representatives, including camp occupants, on questions relating to this procedure.

#### 3.1.4 Accommodations Coordinator

- Specific to non-camp accommodations specific.
- Block and individual bookings will be made through the Accommodation Coordinator designated by the contractor for each community; or similar identified position/person.
- Manage the appropriate assignment and distribution of workers to identified accommodation providers.
- Ensure that the accommodations are meeting Trans Mountain COVID-19 directives and applicable BC COVID-19 guidance/directives.
- Provide a liaison and communications role between TMEP, the contractor and the hotel provider.
- Arrange coordination for support of isolated workers with contractor and hotel provider.

#### 3.1.5 Occupational Health Practitioner (OHP)

- Camp specific.
- Monitor, assess and report any increase in cases of an infectious disease.
- Ensure they have the knowledge skills and abilities to provide care, immunizations and education as required.
- Provide medications or immunizations as indicated or when available.
- Maintain the health clinic, ensure adequate inventories of supplies available, and conduct inspections of equipment.
- Report suspect cases of COVID-19 to TMEP Health and Safety representative immediately.



- Report confirmed cases of COVID-19 to the Jurisdictional Health Authority local medical officer.
  - Camp service providers and other accommodation providers also need to be notified of any cases and take the appropriate response steps.
- Educate authorized service providers who enter the quarantine area on donning and removing personal protective equipment (PPE).
- Monitor the progress of COVID-19 internally and externally on a daily basis by reviewing daily reports as published by the jurisdiction and the Public Health Agency of Canada (PHAC) and adjust the health epidemic procedure as new information is obtained.
- Communicate with logistics immediately when there is a need for an increased stock of supplies.
- Report to site management if there is a need to transport ill employees off site.

#### 3.1.6 House keeping/Food Services Contract Provider

- Ensure a quick transition of dorm to quarantine area when required, including evacuation of dorms in preparation for quarantine and personal protective equipment (PPE) stations.
- Ensure all services to dorm are maintained.
- Ensure all meals to the quarantined dorm are distributed as per plan.
- Ensure all housekeeping and laundry are organized and prepared for the quarantine area.
- Increase housekeeping in the accommodation areas, public areas, kitchen, and lunchrooms upon notification of potential outbreaks.

#### 3.1.7 Camp Worker Supervisors

- Camp specific.
- Assist in reinforcing this procedure with onsite personnel.
- Communicate with family members of ill workers if the worker is unable to communicate with his/her family members to advise of the health status of the ill worker and the steps being taken to ensure effective treatment and or evacuation of the ill worker.

#### 3.1.8 Occupants

- Self-screen for signs and symptoms of COVID-19 and report to their supervisor and OHP if symptomatic.
- Follow instructions as provided by the OHP and treating Health Care Providers.



#### 3.2 Site Access Controls

These steps will be taken to ensure any personnel with an infectious disease or symptoms of an infectious disease will be carefully screened to ensure the safety and security of all personnel operating or occupying a Trans Mountain facility or worksite. All control measures must meet or exceed the requirements set by the *Trans Mountain COVID-19 Response Plan* and Jurisdictional Health Authority.

#### 3.2.1 Self-Monitoring

All personnel will be encouraged to self-monitor for signs and symptoms of COVID-19 and to selfisolate to the extent possible before coming to site.

Any personnel who are or have been off site with any confirmed COVID-19 like symptoms or infectious disease shall:

- Not return to work for the period determined by their jurisdiction of residence and workplace requirements.
- Workers who are off work due to confirmed illness or positive COVID-19 test will coordinate a return-to-work strategy with their direct supervisor and TMEP Health and Safety representative. Return to work plans must include the following considerations;
  - Signed confirmation that the worker has received a negative test result (from Jurisdictional Health Authority or an affidavit from the worker);
  - self-isolation for the required period (10 days from the start of symptoms, or until symptoms resolve, whichever takes longer) or as advised by the Jurisdictional Health Authority; and
  - workers must be symptom free without the use of symptom relieving medications for at least 24-hours prior to return to work.

#### 3.2.2 Health Screening Access Point

A screening process shall be conducted by a qualified medical practitioner at any site entry point prior to site access.

The screening process must include;

- Confirmation of completed *Trans Mountain COVID-19 Self-Declaration Questionnaire*, or equivalent.
  - The response of 'yes' is not intended as an immediate refusal of entry, but an indicator for further screening from a medical practitioner after which refusal for entry may occur.
- Temperature screening.
  - To meet or exceed the standard set by the *Trans Mountain Site Access Temperature Screening Protocol* and all applicable medical requirements.



#### 3.3 COVID-19 Notifications

A positive or presumptive case within the TMEP personnel of a camp or approved accommodations provider will be identified by their employer, camp management or the Trans Mountain Health and Safety representative. The notification of the case must *immediately* occur to the workers immediate supervisor and the TMEP Health and Safety representative, who will then gather additional information using the Extended Workforce Rapid Response form referenced in the *Trans Mountain COVID-19 Response Plan*.

If an update in health status is received indicating the receipt of a positive or negative COVID-19 test result, this must also be communicated *immediately* to the TMEP Health and Safety representative.

#### 3.4 Contact Tracing

Upon identification of a suspect, presumptive or positive case of COVID-19, contact tracing must occur to identify potential for additional exposures on-site while also protecting the personal health information of the individual affected to the extent possible. This effort may be supported by Trans Mountain or the appropriate Jurisdictional Health Authority, as indicated by the situation. Contact tracing must include the following;

- detailed listing of all worksites visited in last 14 days;
- all personnel who came in close contact as defined,
  - o Inclusive of worksites, camp, and/or accommodation settings; and
- all personnel who may have shared facilities with the individual.

#### 3.5 Outbreak Management Plan

Early detection of influenza-like-illness or gastrointestinal symptoms and laboratory testing of symptomatic personnel will facilitate the immediate implementation of effective control measures. In addition, the early detection and immediate implementation of control measures are two of the most important factors in limiting the size and length of an outbreak.

In the event of a suspected outbreak of COVID-19, immediately report and discuss the suspected outbreak with the Medical Health Officer (or delegate) of the Jurisdictional Health Authority.

The Camp or non-camp accommodations COVID-19 plan must include an Outbreak Management section to support early detection and immediate implementation of the control measures. The plan must have the following written components:

- Monitoring system to rapidly identify ill employees
- Early notification by the Infection Prevention and Control Coordinator or the Accommodations Coordinator to the Jurisdictional Health Authority and medical health officer of a potential outbreak
- Early isolation and management of symptomatic and confirmed COVID 19 cases
- Roles and responsibilities of those involved in an outbreak management
- Procedures on how medical staff will manage ill employees
- Develop and implement enhanced infection prevention control measures for managing ill employees on site
- Develop testing procedures including early collection of viral samples and confirm location of local testing site.



- Adequate medical equipment and supplies and use
- Procedures that reduces transmission
  - e.g. grouping ill employees
- Staff training regularly updated to align with current direction from Jurisdictional Health Authority
- Communication strategy that includes signage, messaging to employees, coordination with medical staff and with health authority
- Debrief process and update of procedures where required

#### 3.6 Terminating COVID-19 Measures and Response

Terminating the health pandemic response and quarantine process will be done only after guidance has been issued through the Office of the Provincial Health Officer and TMEP that it is reasonable and safe to retract the measures that have been instituted to respond to COVID-19.

• Monitoring of the pandemic response will continue to ensure alignment with the appropriate level of caution ahead of returning to normal business.

### 4 NON-CAMP ACCOMMODATIONS SPECIFIC REQUIREMENTS

Worker accommodation strategy and approach during COVID-19 shall be subject to and limited to a pre-determined set of hotel properties. Contractors must follow TMEP accommodations preferences. Contractors shall designate worker groups (pods) with sizes in alignment with BC CDC guidance to occupy each hotel property. Coordination with hotel management may indicate that more than one pod can be assigned to the same hotel property.

#### 4.1 Accommodation Options

Contractors must identify accommodation options ("Inventory") in conjunction with Trans Mountain and the appropriate Accommodations Association(s) and/or Tourism Authority(s) to confirm local properties that meet Trans Mountain and contractor requirements, including Trans Mountain COVID-19 requirements and all applicable BC COVID-19 Public Health Orders inclusive of the order pertaining to industrial camps. This process must include as many property options as possible and the following requirements apply;

- Ensure all property owners agree to comply with TMEP COVID-19 Protocols and BC Order.
- Contractors already working from the area may remain in their existing accommodation as long as TMEP COVID-19 directives and BC Order compliance is assured.
- Identified Trans Mountain and Contractor management/foremen may secure private rentals if the property is not shared with other workers.
- Properties which cannot meet the Trans Mountain COVID-19 directives and/or the British Columbia Order Public Health Order (BC PHO) requirements will remain on the Inventory which will be shared with smaller contractors requiring less capacity.
- Properties which have indicated they can meet the requirements outlined above will be asked to provide the following;
  - Confirmation they will comply with, and are accountable for, COVID-19 precautions as outlined in Trans Mountain COVID-19 directives and all applicable BC health directives.



- Commitment to provide the rooms assigned to their property for the duration of the assigned period.
- A copy of the *Trans Mountain COVID-19 Response Plan* must be provided to hotel property management.

Additional criteria for selecting hotel accommodations may include;

- Space and functionality to allow compliance with the BC Public Health Orders and guidance.
- Food services hot breakfast and dinner, bag lunch.
  - Must comply with all BC COVID-19 guidance. Property owners may partner with external food service providers if they also comply with applicable COVID-19 guidance related to food service.
- A dedicated conference room or large interconnected meeting rooms for daily COVID-19 screening.
- Full internet/teleconferencing capabilities for audio video links.
- Independent apartment-style units for contractor workers who have critical construction roles.

#### 4.2 Suspected and/or Presumptive COVID-19 Case

Any worker that has self-identified as having symptoms of COVID-19 are to stay in their room and immediately notify their direct supervisor.

- Workers will seek medical advice and may not self-diagnose or self-determine that their symptoms were unrelated to COVID-19.
- The hotel provider must be notified and supports arranged for the isolated individual.

#### 4.3 Isolation

Workers must self-isolate in their accommodations if they are sick or show ANY signs of illness, notify their supervisor right away, and seek testing from the Jurisdictional Health Authority via 811 or online assessment.

- Workers are required to self-isolate if they are experiencing flu-like symptoms or any of the symptoms associated with COVID-19 (cough, fever, shortness of breath, runny nose, sore throat, etc.) that is not related to a pre-existing illness or health condition.
- If a worker who is symptomatic wishes to return to their home in a vulnerable or Indigenous community, the community health centre must be notified to determine that sufficient resources are in place to support isolation of the individual upon arrival.
- In the event of a COVID-19 positive or a symptomatic individual is identified and is required to self-isolate within the hotel accommodations without opportunity to travel back, the contractor, supervisor or TMEP will arrange to support the individual's isolation requirements and monitor their condition regularly.



## 5 CAMP SPECIFIC REQUIREMENTS

#### 5.1 Site Access

Prior to or during access of the industrial camp, all personnel inclusive of employees, contractors, occupants and visitors must comply with the following;

- Completed Trans Mountain COVID-19 Self Declaration Questionnaire, or equivalent;
  - The response of 'yes' is not intended as an immediate refusal of entry, but an indicator for further screening from a medical practitioner after which refusal for entry may occur.
- Temperature screening; at point of access
  - To meet or exceed the standard set by the *Trans Mountain Site Access Temperature Screening Protocol.*

Camp operators must institute the following processes for the camp access point;

- Maintain a running list of all persons who have accessed the camp for the last six weeks
  - This list must include visitors which encompasses anyone coming on site that does not register as an overnight client, such as social visitors, delivery persons, repair persons, etc.
  - The full name and contact information (telephone number, email and physical address) of the individual.
  - The name and contact information (telephone number, email and physical address) of the individual's employer.
  - Duration of stay.
  - All information collected will be considered private and confidential, to be utilized only in instances of possible contact with COVID-19 and for assistance with Jurisdictional Health Authority investigations/contact tracing
- As per the BC PHO for industrial camps, the camp must provide a COVID-19 training and education session to all persons who enter the camp or is on-site.
  - Training should include safety measures and procedures, physical distancing, proper hygiene practices, and monitoring and reporting illness.

#### 5.2 On-Site Preventative Measures

The camp on-site operator will ensure a state of heightened monitoring of health concerns and facilities transformed to reduce on-site transmission and prevent the possibility of an outbreak during the COVID-19 pandemic.

#### 5.2.1 Hygiene

All workers must be trained by their employer on increased hygiene practices and cleaning. Limiting potential transmission of COVID-19 requires all workers to practice increased hygiene and increased cleaning. Workers must be educated by their employer on measures to prevent infection and transmission. Employers should support increased hygiene by reminding workers to cough and sneeze into elbows, avoid touching one's face with unwashed hands, and dispose of used tissues immediately.

The Camp Operator must provide a suitable number of handwashing stations (see Appendix A: Hand-washing Stations) for the size of the work site and post signage that identifies their location or provide hand sanitizer with a minimum 60% alcohol.



T

- Handwashing stations with soap and water must be made available immediately outside or inside all buildings in which employees are working or eating food.
- Handwashing stations may be either permanent or portable where there is a lack of pressurized water. Wash stations should be checked, cleaned and restocked with supplies three times a shift.
- Soap and water hand-washing stations can be supplemented with waterless hand sanitizers with a minimum 60% alcohol where appropriate. For example, where supplies are available, each employee may be provided with hand sanitizer for personal use that is replaced prior to each shift.
- Handwashing periodically throughout the day and especially before and after break times, after using the washroom, or when workstations are changed, or tools are switched must be encouraged as much as possible.
- Hand washing instructions and reminders will be posted at all handwashing stations.

#### 5.2.2 Safety reminders

As part of the daily safety briefing, workers will be reminded of measures to prevent infection and transmission including that frequent handwashing and avoidance of face touching prevents infection transmission. Additional signage requirements on camp grounds include;

- Posters and printed reminders must be displayed in conspicuous places.
- Display posters that illustrate to:
  - Physically distance (2m/6ft)
  - Cover your mouth and nose with a disposable tissue or the crease of your elbow when you sneeze or cough;
  - Dispose of used tissues immediately;
  - Wash your hands;
  - o physical distancing; and
  - o avoid touching your face, eyes, nose or mouth with unwashed hands.

#### 5.2.3 Cleaning

In coordination with the Housekeeping/Food Services Contract Provider and alignment with their COVID-19 Plan, there will be an increase in cleaning frequency of areas/items/surfaces where there is a likelihood of multiple points of contact. These points of contact shall be cleaned at a minimum of twice a day and after any potential contamination that may occur with some surfaces being cleaned multiple times throughout the day. Cleaning products used for disinfecting must only be used if they are listed by Health Canada as an approved disinfectant against COVID-19 and/or have a Drug Identification Number (DIN)

These surfaces include but are not limited to:

- entrance/exit door handles
- stair railings
- telephones
- faucets and countertops
- television remote controls
- snack and pop machine buttons, coin return and drop bucket
- any community accessible equipment (coffee machines, toasters, microwaves, etc.)
- light switches
- computer keyboards
- games and accessories (i.e.) pool table edges, pool cues, darts, chalk holders, etc.



#### CAMP AND ACCOMMODATIONS COVID-19 GUIDELINE

- chair handles
- temperature control switches
- room keys
- boarding passes

- bathroom stall doors and latches
- soap dispenser handles
- towel dispensers

Proper collection and removal of garbage is crucial to reducing the risk of disease transmission. This includes wearing disposable gloves to remove waste from rooms and common areas and using sturdy, leak resistant garbage bags for containing waste.

- Create a waste removal schedule.
- Ensure there are study, leak resistant garbage bags.
- Provide disposable gloves to anyone handling garbage.
- Ensure anyone handling waste removes gloves and performs hand hygiene immediately after handling and disposing of waste.
- If a garbage bag is punctured or contaminated, it should be placed into a second bag.

#### 5.2.4 Food Service and Hygiene Practices

The cafeteria shall be arranged and managed to minimize the possibility of infectious disease entering the kitchen and dining room area. Handwashing stations must be located at the entrance of the cafeteria and all personnel shall wash their hands prior to entering.

To reduce multiple points of contact and keeping in line with physical distancing, extra measures will also be put in place:

- Tables and chairs reorganized to encourage 2m (6ft) separation.
- Staggered meal schedule to the extent possible.
- Condiments to be replaced by single use packets.
- Buffet-style serving systems must not be utilized whenever such systems can practically be replaced with other systems such as kitchen staff serving food to workers.
- All small food items and snacks should be individually wrapped whenever possible or made available with systems to prevent common touching of either food items or utensils.
- Only kitchen workers and supervisory staff shall be permitted to enter food preparation or storage areas.
- Signs shall be posted to limit the number of people permitted in the dining area and any other common areas.
- Meals should be delivered to the outside of rooms of any workers that are in isolation.
- All employees must wash their hands immediately prior to entering any dining or food preparation area.
- Salad bar and sandwich bar to be closed and prepackaged options to be made available
- Ice cream freezer closed.
- Fresh Fruit, pastries and desserts to be made available in pre-packaged options.
- Markings placed on floors to serve as visual clues for physical distancing.

T

#### 5.2.5 Physical Distancing Practice Implementation

Physical distancing will be communicated to and implemented by all personnel. Physical distancing will reduce the opportunity of spread via respiratory droplets. To encourage physical distancing these practices shall be put in place:

- Visual reminders of how to effectively practice physical distancing (posters, dots on the floor in gathering locations and line up areas).
- Continual communication practices (site notifications, presentations).
- Configuration of cafeteria to promote distancing (reduction of chairs and creating larger tables).
- Staggered meal schedule to reduce occupancy during prime serving times (breakfast and lunch).
- Encourage the use of technology to conduct meetings (Microsoft Teams, Skype, Zoom, phone, etc.).

#### 5.3 Isolation and Quarantine Requirements

Camp Operators are required to place suspect cases of COVID-19 into immediate isolation until such time when a negative test result from the Jurisdictional Health Authority or medical clearance has been received by the individual experiencing symptoms. Notification to the TMEP Health and Safety representative and the individual's direct supervisor of these cases must immediately occur. Camp COVID-19 plans must include the following isolation practices;

- A room with a separate entrance;
- A separate shower/toilet will be designated and cleaned immediately following use;
- Meals will be provided or delivered to the individual in isolation; and
- Isolated persons checked a minimum of twice daily by a designated person to ascertain if medical assistance is required.

The camp COVID-19 plan must also describe the following distinct requirements;

- Policy for when clients can stay in their own existing room to observe isolation or quarantine period.
- Policy for when to relocate individuals to a designated separate group of rooms (e.g. dedicated wing).
  - Consider the safe handling of movement of client belongings, where necessary.
- Number of rooms available for quarantine/isolation (e.g. one person per room).
  - Consider access to washrooms and showers.
- Describe how common bathrooms used by quarantined/isolated individuals will be cleaned/disinfected after each use.
- Describe protective measures for staff that interact with and support clients in isolation/quarantine.
- Describe capacity to care for symptomatic individuals.
  - o Describe capacity to serve meals to quarantined/isolated individuals in the ir rooms.
- Describe how quarantine/isolation rooms will be safely cleaned/disinfected during the individual's stay and after isolation period ends (i.e. before others can occupy the room).



ጠ

- Describe how clothing/bedding/linens will be laundered for individuals in quarantine/isolation.
- Describe how isolating/quarantining individuals will be monitored for deteriorating health

Workers must self-isolate in their accommodations if they are sick or show ANY signs of illness, notify their supervisor and the Camp Operator right away; and seek testing from the Jurisdictional Health Authority via 811 or online assessment.

- Workers are required to self-isolate if they are experiencing flu-like symptoms or any of the symptoms associated with COVID-19 (cough, fever, shortness of breath, runny nose, sore throat, etc.) that is not related to a pre-existing illness or health condition.
- If a worker who is symptomatic wishes to return to their home in a vulnerable or Indigenous community, the community health centre must be notified to determine that sufficient resources are in place to support isolation of the individual upon arrival. The appropriate Jurisdictional Health Authority must be contacted for medical advice prior to returning to the community.

#### 5.3.1 Waste Management for ill Workers

- Designate one person, or small team to handle waste from all self-isolation rooms.
- All waste can go into regular garbage bags; line the container with a plastic bag.
- Take care not to touch the inside of the container, and wash hands well after emptying the waste.

#### 5.3.2 Monitoring Close Contacts

For personnel that have come into close contact with someone with suspect or confirmed COVID-19 may be required to self-isolate, dependent on the nature of the close contact and advice of the site OCP.

Employers must ensure that the following employees do not come to work and begin self-isolation. In some cases, specific orders may need to be followed. Those orders will be identified through a case-by-case system.

- Workers who are ill, whether the illness has been confirmed as COVID-19.
- Workers with COVID-19-like symptoms must begin self-isolation and be reassessed for when they can return to work.
- Workers who share a residence with a person who has been exposed to COVID-19.

Ψ

#### 5.3.3 Notifying the Health Authority of an outbreak

The local Medical Health Officer of the Jurisdictional Health Authority must be notified immediately if there is an outbreak or if there is a suspicion of an outbreak.

- An outbreak is when two or more cases of fever and/or respiratory symptoms (cough, sore throat, runny nose, shortness of breath, gastrointestinal illness) are detected.
- To reach your local Medical Health Officer, contact:

Fraser Health Authority Phone: (604) 870-7903 Email: <u>HPLand@fraserhealth.ca</u>

Interior Health Authority Phone: (250) 851-7305 Email: workcamps@interiorhealth.ca

Island Health Authority Phone: (250) 519-3401 Fax: (250) 519-3402 Email: gateway office@viha.ca Northern Health - Communicable Disease Hub Phone (during business hours): 1-855-565-2990 On-call Medical Health Officer after hours phone: 1-250-565-2000, press 7 and ask for the Medical Health Officer on call

Vancouver Coastal Health Authority Phone: (604) 675-3800 Manager on call Fax: (604) 736-8651 Email: <u>EHVC@vch.ca</u>

#### 5.4 Coordination with Work Site Contractor

The Camp Operator must work with the work site to implement a strategy to safely transport sick workers from the worksite for placing them directly into isolation at the camp. Workers with relevant COVID-19 symptoms are expected to leave a worksite immediately and return to their accommodations.

Additionally, to identify all close contacts of a suspect case, the Camp Operator and the Contractor must coordinate efforts. Work camp and work site communication protocols must include the following;

- Protocol for notification between work site contractor and the work camp when workers become symptomatic "at work".
- Protocol for work camp to notify work site(s) when symptomatic occupants are identified and/or when occupants are isolating.
- Protocol for notification to the work camp by the work site(s) of any workers who left a work site with symptoms for the purposes of identifying close contact with work camp staff and/or clients.

Appendix G

#### Trans Mountain Rapid Response Procedure - Appendix C - Response Scenarios

# Eirst step is to notify supervisor and hr via self service app or directly That these are examples of how typical situations are currently handled under rapid response protocol. Subject to change based on guidance Response protocol as amended from time to time will prevail.

Updated as of October 1, 2020

	Scenario	Description	Risk Level	Notifications	What worker must do	What supervisor must do	Return to work?	
	1	POSITIVE CASE: Worker tests <b>positive</b> for COVID-19	HIGH	All workplace close contacts will be identified, notified and required to self- isolate for 14 days.	Worker must self-isolate and follow direction from healthcare providers, public health authorities AND notify their supervisor. The worker will provide contact tracing to Trans Mountain for their work-related activities in the 48 hours prior to the positive test. Worker must update the self-reporting dashboard.	Report the illness to HR and update the self- reporting dashboard if the worker has not already done so. Arrange for workstation sanitization if the worker was in the workplace while ill or within 48 hours of becoming ill.	The worker may return to work following their 14 day isolation p releases them to work <b>OR</b> b) these three things are all true 1) no symptoms have improved and 3)at least 10 days have passed sin have passed since their test was administered if they never deve respiratory symptoms is required, except for cough. Absence of to have a chronic cough or are currently experiencing a post vira	
	2	PRESUMPTIVE CASE: Worker <b>has</b> COVID-like symptoms.	HIGH	All workplace close contacts will be identified, required to self-quarantine away from work until initial worker test results confirmed or worker is cleared. If initial worker results indicate COVID positive: all close contact workers will be required to self-quarentine. If Negative results: close contact workers will be cleared for work by HR using apropriate process.	Worker must self-isolate from home, follow strict personal hygiene rules and monitor their symptoms. They must call their medical provider and discuss testing. They must also notify their supervisor as soon as possible and provide contact tracing to Trans Mountain for their activities in the last 48 hours. The worker must update the self-reporting dashboard.	done so. Arrange for workstation sanitization if	A worker who was presumed positive may return to work if they to not have COVID-19 (negative test result) and if they have had have improved. If a worker has not been tested for COVID-19 th fever for 3 days without medication and other symptoms have in since their symptoms first appeared. Note: Resolution of respi cough. Absence of cough is not required for individuals known t experiencing a post viral cough.	
	3	DIRECT EXPOSURE: Worker has <u>no</u> symptoms of COVID-19 but <u>had</u> close contact with somebody who tested positive for COVID-19 (worker directly exposed to COVID)	MEDIUM	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker must self-quarantine away from work and follow strict personal hygiene rules, and monitor their symptoms. They must call their medical provider and discuss testing. The worker must also notify their supervisor, provide contact tracing to Trans Mountain for their activities in the last 48 hours. The worker must update the self-reporting dashboard.	Report the isolation to HR and update the self- reporting dashboard if the worker has not already done so.	The worker may return to work if after 14 calendar days from la positive, they never developed symptoms.	
	3a	DIRECT EXPOSURE - Worker has <u>no</u> symptoms of COVID-19, but <u>lives with</u> someone who has been <u>confirmed</u> to have COVID-19.	MEDIUM	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker must self-quarantine away from work and follow strict personal hygiene rules, and monitor their symptoms. They must call their medical provider and discuss testing. The worker must also notify their supervisor, provide contact tracing to Trans Mountain for their activities in the last 48 hours. The worker must update the self-reporting dashboard.	Report the isolation to HR and update the self- reporting dashboard if the worker has not already done so.	The worker may return to work if after 14 calendar days from la positive, they never developed symptoms.	
	3b	DIRECT EXPOSURE - Worker has <u>no</u> symptoms of COVID-19, but <u>lives with</u> someone who <b>has been</b> quarantined due to COVID exposure <b>AND</b> that person <u>is</u> experiencing symptoms of COVID-19.	MEDIUM	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker must self-quarantine away from work, follow strict personal hygiene rules and monitor their symptoms. They must call their medical provider and discuss testing. The worker must also notify their supervisor, provide contact tracing to Trans Mountain for their activities in the last 48 hours. The worker must update the self- reporting dashboard.	Report the isolation to HR and update the self- reporting dashboard if the worker has not already done so.	The worker may return to work if the person they live with has t a negative test result) <b>AND</b> the worker is not exhibiting symptor the worker may return to work if the worker has isolated from t <b>AND</b> the worker is not exhibiting symptoms.	
	4	POTENTIAL EXPOSURE: Worker has <u>no</u> symptoms of COVID-19 but <u>lives with</u> someone who <u>is</u> exhibiting symptoms of COVID-19 but has no known exposure to someone with COVID-19.	MEDIUM	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker must self-quarantine away from work and follow strict personal hygiene rules and monitor their symptoms. They must call their medical provider and discuss testing. The worker must also notify their supervisor and provide contact tracing to Trans Mountain for their activities in the last 48 hours. The worker must update the self-reporting dashboard.	Report the isolation to HR and update the self- reporting dashboard if the worker has not already done so.	The worker may return to work if the person they live with has t a negative test result) <b>AND</b> the worker is not exhibiting symptor the worker may return to work if the worker has isolated from t <b>AND</b> the worker is not exhibiting symptoms.	
	5	POTENTIAL EXPOSURE - Worker has no symptoms of COVID-19, but lives with someone who is quarantined but that person is NOT experiencing symptoms. (e.g. a child's class/sports team/activity group has been contacted to isolate due to potential exposure, however, the Health Authority does not require other household members to isolate)	LOW	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker is low risk and should continue working. Monitor symptoms. Consider voluntary work from home if appropriate	No action	No action unless change in status of exposure or symptoms.	
	6	POTENTIAL EXPOSURE - Worker was in a facility or crowd where <b>someone tested positive</b> OR <b>is</b> <b>presumed</b> to have COVID-19. The worker is not aware of being in close contact with the positive/presumptive case, and has <u>NO</u> symptoms of COVID-19 and <b>has not been directed to self-isolate</b> . (e.g. announcements of cases in airports, faith settings, schools, concerts, restaurants, theatres etc.)	LOW	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker is low risk and should continue working. Monitor symptoms. Consider voluntary work from home if appropriate	No action	No action unless change in status of exposure or symptoms.	
	7	NO EXPOSURE - Worker had <b>close contact</b> with a person who in turn had close contact with someone who tested positive or is presumed to have COVID-19.	LOW	No close workplace contacts of the individual at work will be asked to self- quarantine unless the worker exhibits symptoms.	Worker is low risk and should continue working. Monitor symptoms.	No action	The worker should monitor their symptoms and return to work.	

Close contact means living in the same household as a person infected, caring for someone who's infected, being within 6 feet, or 2 meters, of someone who has COVID-19 (or is presumed to) for more than 15 minutes in a 24hour period, or direct exposure from someone who's infected (e.g., being coughed on, sneezed on, sharing bottle of water or utensils).

#### k?

on period if: a) their health care provider ) no fever for 3 days without medication 2) d since their symptoms first appeared or 10 days develop any symptoms. Note: Resolution of e of cough is not required for individuals known viral cough.

f they are detemined by their health care provider e had no fever for 24 hours and their symptoms 19 they may return to work if they have had no ave improved and at least 10 days have passed respiratory symptoms is required, except for wn to have a chronic cough or are currently

m last contact with someone who tested

om last contact with someone who tested

as been cleared by a medical provider (received btoms. If the household member is not tested m the person they live with for at least 14 days

has been cleared by a medical provider (received ptoms. If the household member is not tested om the person they live with for at least 14 days