

EMERGENCY PLANNING: 8 Emergency Preparedness & Response Tips



Emergencies may be rare but when they occur, they can be catastrophic. Just look at the recent sawmill explosions and fires in BC and the shopping centre parking garage collapse in Ontario for a few examples. To minimize injuries, fatalities and property damage, it's critical that your company effectively plans for emergencies and how to respond to them by developing and implementing an emergency plan. Here's an overview on the laws that impact emergency planning and response and eight tips for ensuring that your company and its workers are adequately prepared for any emergency.

THE LAW ON EMERGENCY PREPAREDNESS & RESPONSE

There are several laws that impose emergency preparedness and response duties on companies:

OHS Laws

The OHS laws in every jurisdiction require employers to plan for workplace emergencies. Most jurisdictions require emergency plans for general emergencies, such as fires, explosions, building and equipment collapses, serious safety incidents, etc. They may also require emergency plans for certain hazards, such as confined spaces, or activities, such as diving operations.

Environmental Laws

Companies must also be prepared to respond to emergencies that could impact both workers and the environment, such as spills of hazardous substances. The federal *Environmental Emergency Regulations*—commonly known as the E2 Regulations—require companies to have environmental emergency or “E2 plans” under certain circumstances, such as when they possess designated hazardous substances in excess of certain amounts. The E2 Regulations spell out:

- Which facilities must have an E2 plan;
- The factors to be considered in developing the plan;
- What the plan must cover; and
- The information on the plan the facility must report to the government.

Transportation of Dangerous Goods Laws

The federal *Consolidated Transportation of Dangerous Goods Regulations* (TDG Regulations) require companies that transport or import certain dangerous goods to have emergency response assistance plans (ERAPs) to control and address any accidental releases that may occur. The federal requirements have been adopted in all Canadian provinces and territories. The intent of an ERAP is to help local authorities respond to an incident involving dangerous goods, such as by providing emergency response advice, specialized equipment or response teams. The TDG Regulations cover topics such as when an ERAP is required and how to apply for approval for your ERAP.

8 Emergency Planning Tips

Tip #1: Plan for Wide Variety of Emergencies



Your emergency plan can't just address fires and that's it. It must be comprehensive and account for all types of emergencies to which your workplace could reasonably be exposed—including both man-made emergencies, such as power outages, acts of terrorism and explosions, and “natural” events, such as hurricanes, floods, blizzards and earthquakes. When developing your emergency plan, create a list of probable emergencies that could occur in or near your workplace, taking into account:

Location. Consider your company's location, including its geographic location and proximity to other workplaces or sites that could pose a hazard. For example, an insurance company will generally face only typical emergencies, such as fires and power outages. But if the company's located near a chemical manufacturing plant, it's at risk of exposure to additional types of emergencies, such as releases of toxic substances. And if the company's located near government offices, it could be endangered by acts of terrorism aimed at those offices.

Also consider the weather conditions or natural phenomena to which your company could be exposed by virtue of its location. For example, companies located on the coast are at risk of hurricanes, while companies located in the interior of the country may face a risk of tornadoes or flooding. And a company in an area near a fault line should be prepared for earthquakes.

Nature of the company's work. Obviously, a industrial workplace will be at risk of different or additional emergencies than an office setting. So consider the nature of your workplace's operations in your emergency planning, including the machinery, chemicals and other potentially dangerous substances that are manufactured, used or stored in the workplace. For example, the presence of combustible dust in the workplace increases the risk of explosions and fires.

Tip #2: Make Sure Key Players in Plan Know Their Roles



All employees should be given copies of the company's written emergency plan, trained on it and participate in regular drills of the emergency procedures. But it's particularly important that anyone with a key role in the plan is aware of that role and adequately trained to fulfil it. For example, if a worker is assigned to help a disabled co-worker evacuate, that worker needs to know he has this responsibility and be trained on the kind of assistance he may have to provide for his co-worker. And if a supervisor has the role of ensuring that his section of the facility is fully evacuated before leaving himself, make sure he understands this duty.

Example: On Aug. 13, 2011, nearly 12,000 people were waiting for the start of a concert by the band Sugarland at the Indiana State Fairgrounds when a temporary structure supporting spotlights and other equipment mounted on top of the stage collapsed due to the wind. Seven people died and more than 40 required medical treatment. A year later, the Indian State Fair Commission (ISFC) released a new emergency plan based on an investigation of the incident that focused on the effectiveness of the emergency preparedness and response measures in the aftermath of the collapse. According to an executive summary of the investigation one of the criticisms of the emergency planning for the event was the fact that a senior ISFC official had a role in the emergency plan but wasn't aware of his role and hadn't been trained to fulfil it.

Tip #3: Include Contractors in Emergency Planning



Your company's own staff aren't the only ones who need to be trained on the emergency plan. If you regularly use contractors who may be present in the workplace when an emergency happens, you should include them in your emergency planning. The degree of their involvement will depend on the nature of their work, extent of their presence in the workplace and other factors. But at a minimum, give all contractors a copy of the emergency plan and basic training on it, such as what to do and where to go if the fire alarm goes off.

Example: The investigation into the Indiana stage collapse revealed that the ISFC relied heavily on contractors for the major productions at the stage. But with few exceptions, these contractors weren't aware of the emergency response plan and procedures or involved in their development, didn't participate in drills of the plan and weren't trained on it.

Tip #4: Address Needs of Disabled Workers



Workers with disabilities may not even realize there's an emergency when one occurs or may have trouble safely evacuating. For example, a hearing disabled worker may not hear alarms or evacuation instructions over a PA system. And a worker with a mobility impairment may not be able to escape down a staircase.

So your emergency plan must be designed to protect *all* workers, including those with disabilities. An emergency plan that doesn't address the needs of such workers violates an employer's general duty because it doesn't adequately protect them. In addition, the human rights laws both bar employers from discriminating against workers based on a disability and require them to accommodate disabled workers by modifying workplace policies, procedures and physical conditions to the point of undue hardship. And modifying a workplace's emergency plan to accommodate the needs of disabled workers is likely to be considered a reasonable accommodation.

To adequately address the needs of disabled workers in emergency planning, do the following:

- Determine what their needs are as to evacuation and emergency response;
- Designate co-workers to help disabled workers in emergencies;
- Assess the workplace to identify potential hazards or barriers to a disabled worker in an emergency;
- Create areas of refuges where disabled workers can shelter in place or

await evacuation;

- Ensure you can communicate emergency information to all workers; and
- Cover the needs of disabled workers in emergency training and drills.

Tip #5: Make Sure Emergency Exits Are Accessible



Emergency planning is useless if workers can't get to emergency exits or find that they're obstructed. A blocked emergency exit can have tragic consequences for workers and lead to fines for employers.

Example: A worker at an Ontario car wrecking yard was removing a gas tank from a car. But the tank wasn't empty. Gas spilled out of it and was ignited by a nearby inspection lamp, causing a fire. Because the emergency exit was blocked, three workers were forced to run to the other end of the building to escape. As a result, all three suffered burns and smoke inhalation. Their employer was fined \$5,000 for failing to ensure that emergency exits were free from obstructions and another \$55,000 for failing to provide information, instruction and supervision to a worker for the safe removal of a gas tank [Woodstock Auto Recyclers Ltd., Govt. News Release, April 26, 2012].

Tip #6: Coordinate Emergency Planning with Local Authorities



When there's an emergency in your workplace, you'll likely need the assistance of local authorities, such as the police, fire department or emergency response team. So it's important to include these groups in your emergency planning. At a minimum, you should give them copies of your emergency plan and any other information that could be useful in an emergency, such as a diagram of the layout of the workplace and shift records indicating who's working and where at any given time. Having this information will make their response more effective.

Example: In the second of two incidents at BC sawmills this year, an explosion and fire killed two workers and sent 24 people to the hospital. When emergency response teams got to the scene, they had to scramble to make sure they'd located and evacuated everyone from the building—a process made more complicated because they didn't have access to shift records. So emergency responders didn't know exactly who was working and where at the time of the explosion.

Tip #7: Do Practice Drills—and Revise Plan Based on Results



An emergency plan may look good on paper but, in reality, not be practical or effective. The only way to know for sure whether your emergency plan is adequate—before an actual emergency happens—is by conducting practice drills. Such drills enable you to identify issues or weak spots in your emergency planning and help clarify roles and responsibilities.

But the drills are only truly helpful if you use the information you get from them to improve your emergency plan. For example, if a drill reveals that a certain evacuation route isn't practical for some workers, devise another route for those workers and include it in the plan. Failing to update the emergency plan based on feedback from drills is a missed opportunity to improve your plan.

Example: The report on the Indiana stage collapse noted that although a Tabletop Exercise involving a severe weather incident was conducted, the participants didn't hold a post-exercise discussion to evaluate the exercise. In addition, no one prepared an After-Action Report summarizing the lessons learned and recommendations from the exercise, although an Executive Summary of the exercise was subsequently provided. But the recommendations from this exercise weren't implemented before the 2011 State Fair.

Tip #8: Plan for Impact of Emergencies on Business Operations



Workplace emergencies impact not only the company's staff but also its operations. For example, the company may need to close down all or part of the workplace to clean up the damage, repair or replace equipment and materials, and allow for internal and government investigations. And if the company isn't prepared, these disruptions could cause operations to slow down or even stop—often resulting in serious financial problems.

Your emergency plan shouldn't address these operational issues. Instead, your company also needs a so-called business continuity plan. Although emergency plans and business continuity plans are related, their goals are different. An emergency plan is designed to save lives, prevent injuries and minimize property damage; a business continuity plan is designed to enable the company to continue to meet its business and legal obligations and provide critical services or products after emergencies with the least possible disruption until normal operations can resume. To prevent harm to the company's brand, reputation and customer relations, business continuity plans do two key things:

- Spell out the steps, measures and arrangements needed to ensure the continuous delivery of critical services and products; and

- Identify the resources needed to support operations continually, including personnel, information, equipment, finances and infrastructure.

BOTTOM LINE

Preparation and planning are the keys to effective emergency response. Use these tips to ensure that your company's emergency planning and response efforts are adequate if they're put to the test in the event of an actual emergency.

More Emergency Planning Resources

For more information and tools on dealing with emergencies in the workplace, go to the OHS Insider's Emergency Preparedness & Response Compliance Centre, which includes:

- Fire safety checklists for industrial workplaces or offices
- A workplace flood preparedness and response checklist
- An earthquake preparedness activities checklist
- Posters on emergency preparedness that you can display in your workplace.
- And for training materials on emergency preparedness, such as videos, e-learning courses and safety talks, go to Safety Smart. (You'll need to be a Safety Smart member or sign up for a trial membership to access these training tools.)