



October 23, 2015

Ms. Lisa Lapointe,
Chief Coroner
BC Coroners Service, Ministry of Justice
Metrotower II Suite #800
4720 Kingsway
Burnaby, BC V5H 4N2

Dear Ms. Lapointe:

**Re: Jury Recommendations - Lakeland Mill (File 2012:0607: 0044/0045) and /
- Babine Forest Products (File 2012:0612: 0001/0002)**

The Manufacturing Advisory Group (MAG) and the BC Forest Safety Council (BCFSC) are committed to the principle that every worker deserves to go home injury-free at the end of each shift. We therefore thank the jurors, witnesses, families, legal counsel and BC Coroners Service for their participation in the inquests to help further that objective. We also know that one of the best ways we collectively may honour the memories of these four men – Glenn Francis Roche, Alan Harvey Little, Carl Rodney Charlie and Robert Francis Luggi – is by ensuring stakeholders in this matter continue to implement the knowledge, processes and procedures identified to help prevent any similar re-occurrence in the future. MAG and the BCFSC are fully committed to working with the other agencies named in the juries' recommendations to ensure effective solutions are achieved.

This letter serves as our formal response to indicate our views, actions and intended future actions relating to the juries' recommendations specific to MAG and the BCFSC which became the health and safety association for MAG, effective April 1, 2015, on a trial basis until December 31, 2016.

We will ensure that you are kept apprised of the progress that is made in implementing these recommendations.

Lakeland Mill

Jury Recommendations at the Inquest into the deaths of Alan Harvey Little and Glenn Francis Roche:

No. 1. Collaborate to develop a training program with certification to foster active participation in joint health and safety committees.

MAG and the BCFSC will undertake a comprehensive review of this recommendation in collaboration with the United Steelworkers. MAG companies are fully committed to ensuring active as well as effective participation in joint health and safety committees with the purpose of creating and sustaining workplaces that effectively meet the health and safety needs of all workers.

No. 28. Minutes of all mill safety committee meetings and investigations must be forwarded and read by all supervisors, superintendents, managers and mill owners.



This is currently best practice and well established in many mills. Mills within MAG have made available prototype minute documents and distribution lists, available via the BCFSC website to assist any of the smaller mills that may not already have these processes in place.

No. 29. Mills must ensure that there are enough millwrights, mechanics, electricians and clean-up staff to keep up with the daily demands of mill operation. Inspections, repairs, maintenance and clean-up should not be allowed to fall behind.

MAG is strongly committed to ensuring that the right resources are in place for the type, size and nature of operations, whether 24-hour or 12-hour operating cycles with different shifts. MAG companies have trained their managers, supervisors and workers to impress upon them that everyone has a continuing responsibility to monitor situations where dust is accumulating beyond acceptable levels as legislated. In addition, all employees have been reminded and are expected to report any unsafe work situation and have the right to stop work if they feel dangerous dust accumulations are occurring. A large percentage of MAG company operations have also incorporated daily inspections of dust accumulation, technology and clean-up efforts by an independent staff member or contractor. These daily inspections have been sustained as a best practice following the conclusion of Phase 5 inspections by WorkSafeBC.

No. 30. There should be a “Safety Watch Person” on every shift to continually monitor dust systems, vacuum systems, conveyors and electric motors.

As previously noted, everyone has been trained to monitor situations including where dust is accumulating beyond acceptable levels as legislated. In addition, every MAG operation is committed to adhering to the dust management plan established for their operations which includes the monitoring of each piece of equipment to ensure that dust levels are within the pre-defined safety levels. Our view is that there is a stronger system in place with every individual in the mill, management and hourly, essentially trained and monitoring dust as part of their roles.

No. 31. Implement recommendations #1, #2 and #3 of the BC Safety Authority Report into the Lakeland Mills Ltd. Explosion and Fire, which are:

Recommendation #1: Document a facility assessment to identify hazardous locations that is completed by a professional that is qualified to identify combustible dust hazardous locations, and in accordance with a recognized industry standard for combustible dust hazardous locations.

Recommendation #2: Where hazardous locations are identified and contain regulated equipment, document a plan to either: develop and implement auditable wood dust management practices for these locations that are accepted by a qualified person as an effective means to manage the combustion hazard; or, configure the equipment for safe operation given the presence of the combustible dust hazard. Safe operating configurations include:

a) obtaining approval for operation in the hazardous location, or



b) permanent removal of the equipment from the hazardous location.

Recommendation #3: Incorporate any identified hazardous locations and the chosen means to manage the combustion hazards into the facility's Fire Safety Plan, or other suitable facility document(s).

These recommendations deal with the documentation and identification of hazardous locations and the development of plans to manage dust accumulations around those locations. These recommendations became a safety order which all operations have now met.

Babine Forest Products

Jury Recommendations at the Inquest into the deaths of Robert Francis Luggi and Carl Rodney Charlie:

No. 1. Ensure that all plants have proper outdoor lighting, a fire pumping system, a stand-alone first aid facility and well identified muster stations. All of these installations should be serviced by a fully functional automatic emergency power system.

MAG and the BCFSC will undertake a comprehensive review of this recommendation.

No. 27. Compile and make available best practices including life safety engineering related to construction of new wood processing plants and for refitting old plants to address combustible dust issues.

MAG companies presently share and make available best practices including life safety engineering related to construction of new wood processing plants and for refitting existing plants to address combustible dust issues.

MAG has also worked with a number of engineering firms and insurance companies over the past two years and is confident that all new construction and refitting of existing MAG plants will be carried out in such a way to effectively manage and mitigate combustible dust issues. In addition, the MAG Sawmill Dust Audit includes evaluating new and retrofitted construction features, engineered ventilation systems, and mechanical and electrical systems.

No. 28. Encourage employers to utilize the existing Manufacturing Advisory Group dust audit tool regarding combustible dust mitigation.

MAG companies are required to utilize the MAG dust audit tool as a condition of participating in MAG. In addition, in 2014, the BCFSC in conjunction with the MAG, made available a team of technical expert advisors for all sawmills in BC. The purpose of the initiative was to provide comprehensive support and expertise to the sawmill industry on combustible dust control and mitigation at no cost to the industry. MAG and the BCFSC have worked and continue to work with the various industry associations to encourage employers to utilize the MAG dust audit including making the audit tool available on the various industry association websites.

No. 33. To ensure the effective sharing of information to ensure ongoing risks can be evaluated by all members of the safety community.



BC Forest Safety
Unsafe is Unacceptable

MAG

Manufacturing Advisory Group

MAG meets regularly to discuss and share information regarding ongoing risks. To support this sharing and dissemination of information, a section on the BCFSC website is being created as an online resource for industry and others to find relevant, timely information on safety issues facing mills.

Please contact us if any further information or clarification on the above is required. Our commitment to safety is unwavering, and we thank you for the opportunity to provide this input.

Yours truly,

Ken Higginbotham,
On behalf of MAG

Reynold Hert, CEO
BC Forest Safety Council