



Accident/Incident Investigation Policy

Effective: April 19, 2004
Reviewed: June 29, 2011
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PURPOSE

The purpose of this policy is to establish a consistent procedure at the Calhoun Mill for the investigation of all accidents and incidents that affect or have the potential to affect individuals, equipment, or operations. The investigation process will identify and analyze root causes and provide a system for implementing and tracking corrective actions to prevent future accidents/incidents.

The accident/incident investigation is a fact-finding process and is not intended to place blame on individuals, but rather to identify and correct system failures. Discipline for behavior that results in an accident will be dealt with separately from this procedure. There will be no discipline issued to any employee who voluntarily makes the initial report of a near miss incident.

SCOPE

This policy applies to all ResoluteFP employees, contractors, visitors and vendors while on the Calhoun Mill site. Investigations will be performed for all accidents and incidents, including near misses.

DEFINITIONS

Accident/Incident: An undesired event that results in harm to people, damage to property, or loss to the process.

Near Miss: An undesired event, which under slightly different circumstances, could have resulted in harm to people, damage to property, or loss to the process. All near misses are to be investigated.

Investigation Team: Team to include the involved employee, employee's direct supervisor, witnesses, and any subject matter experts or a Safety Department representative (as needed).

PROCEDURE

- A. All accidents/incidents that result in an injury are to be immediately reported to the individual's supervisor/team leader and to Health Services or EMS/Security.
- B. All incidents are to be immediately reported to the individual's supervisor/team leader and the Safety department.
- C. Area Team Leaders/Supervisors should assess the area and see if any hazards need to be immediately corrected. The Team Leader or Area Supervisor is responsible for documenting the accident or incident in the mill Incident Reporting System (IRS). Investigations are to be started as soon as possible or before the end of the shift.
- D. Upon completion of the accident and/or incident investigation process, all corrective actions will be documented in the report and every effort will be made to finish the identified actions within 30 days from completion of the investigation process. Corrective actions that may involve engineering design or control, or major expense dollars, should be finished no later than 120 days from the completion of the investigation process. However, corrective action requiring capital expense could take longer than 120 days for correction.
- E. Some issues may be of a more serious nature and will require corrective action to be taken immediately. The investigating team and/or the Safety Department will determine if immediate corrective action is required.

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- F. When the Tennessee Occupational Safety and Health Administration (TOSHA) is required to be contacted due to an accident or incident, the Safety Manager along with a member of Mill Management will coordinate communications. The Environmental Director, along with a designated member of Mill Management, will contact Environmental Agencies as required by regulations.
- G. Accident/incident investigations are to be documented on the Incident Reporting System (IRS) which is located on the Calhoun Intranet Home Page. Any pictures taken during the investigation may be electronically attached to the investigation form.
- H. Information obtained through the Accident and Incident Investigation process will be communicated to employees and/or other company facilities to share lessons learned for the purpose of preventing future injuries, property damage or process loss.

RESPONSIBILITIES

A. Employee

- 1. Report all accidents and incidents when they occur.
- 2. Participate in the investigation process as outlined in this policy.
- 3. Assist in corrective action measures.

B. Safety Department

- 1. Participate in investigation process as outlined in this policy.
- 2. Ensure the accident/incident investigation policy is current, updated as needed, and reviewed annually.
- 3. Audit the quality of the investigations and follow up when needed.
- 4. Ensure that the results of all investigations are communicated to all appropriate individuals and facilities to share lessons learned.

C. Superintendent/Department Leader/Supervisor/Team Leader/Area Shift Supervisor

- 1. Begin proper investigation as outlined in this policy.
- 2. Responsible for initially filing a report using the mill Incident Reporting System.
- 3. When an injury occurs, the employee's immediate supervisor, or area supervisor if a contractor is injured, will contact all other supervisors and hold a meeting to describe the incident. Each supervisor will then relay the information to their respective crews.
- 4. Coordinate all investigations and assist in assigning employees to conduct the investigation.
- 5. Make sure that accident/incident information is preserved at the time of the event and witnesses are properly identified. Witnesses should be interviewed separately and invited to participate as members of the investigation team.
- 6. Conduct re-training on safe work procedures when needed.

D. Department Manager

- 1. Review all accident & incident investigation reports dealing with their area of responsibility.
- 2. Ensure corrective action items receive the appropriate level of priority for completion.
- 3. Provide leadership in investigation procedures and support.
- 4. Review the quality of subordinate's accident/incident investigation techniques and ensure supervisors are performing investigations by getting to the root cause and that corrective action is adequate to prevent reoccurrence.
- 5. Ensure the Accident Investigation Database is not be used in any forms of discipline.



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Approval Signatures:

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