

Inside the Issue

- [Call to Action– p. 2– 9](#)
- [HOP/HPI Course– pg. 10](#)
- [Join PPSA's new Contractor Committee! - p.13](#)
- [Case For Safety- p. 21](#)
- [Lessons from a 1,200 fps Mistake - p. 24](#)
- [Upcoming PPSA Webinars - p. 25](#)
- [Member Spotlight – p. 28 - 29](#)
- [PPSA Committees- p. 34- 35](#)
- [OSHA QuickTakes - p. 39](#)
- [Legal Corner- p. 43-44](#)
- [About PPSA - p. 52](#)
- [PPSA Board of Directors - p. 53](#)
- [Domtar's Safety Journey p. 55-59](#)

A Letter From Our Chair

Paul Bierley, CSP
Senior Manager of Corporate Health and Safety
Domtar



On behalf of the entire PPSA Board of Directors, I'd like to say thank you to our members, corporate and vendor partners for your continued efforts and support of the PPSA. The PPSA Board of Directors and the associations committees have been working diligently to create valuable programming and publish articles to drive safety development at all levels of the pulp and paper industry.

In particular there are a few of these projects that rise to the level of special recognition and serve as a reminder to everyone:

- The education committee continues to work on developing webinars, and has been working with Shane Bush to develop a special [HOP/HPI course](#) June 26-27, 2019. This course will begin after the conclusion of the [2019 PPSA Safety and Health Conference](#). Special registration rates are available for PPSA Members and those who attend both the 2019 annual conference and the HOP/HPI Course. For more information on the course and registration please click [here](#).
- [Registration](#) is open for the annual conference to be held at the San Antonio Marriott Riverwalk, San Antonio, TX from June 23 to 26, 2019. The conference features an exceptional program with focuses on safety leadership, human organizational performance, and emergency preparedness. [If you've never been](#), please consider on attending to learn, network, develop your skills and meet a large spectrum of vendors with new and innovating equipment and processes to improve your processes in your facilities.
- It is with great enthusiasm that the Pulp & Paper Safety Association (PPSA) reaches out to all our members, our industry, and beyond for a Call to Action. This new publication is now available on www.ppsa.org, and the Pulp and Paper Safety Association Board of Directors invites you to read and discuss its Call to Action article available in this edition of the Quarterly Report and online [here](#).

PPSA strives to improve the Safety and Health processes across our industry. If at any time you have a suggestion, need assistance, or information on an issue or have a success you want to share, please do not hesitate to contact us.

Stay Safe!
Best Regards,
Paul Bierley, PPSA General Chairman



PULP, PAPER & FORESTRY INDUSTRY - A CALL TO ACTION

HYPER FOCUS & MISUSE OF TOTAL RECORDABLE INCIDENT RATE (TRIR)

It is with great enthusiasm that the Pulp & Paper Safety Association (PPSA) reach out to all our members, our industry, and beyond for a **Call to Action**. For many decades the Pulp and Paper Industry has made great strides in improving safety results. The industry safety journey has moved from a laissez faire approach, through focused compliance, prioritization, adopting a caring and values methodology and today - amidst a true understanding of science - a human organizational performance approach. Our efforts and successes have been immeasurable and many of us are on the cusp of greatness, but one critical challenge remains. There is a seemingly unshakeable obstacle that impacts all industry - a self-induced barrier in how we use lagging metrics -our failures- to evaluate and compare our performance. More specifically and certainly the worst is the use of the Total Recordable Incident Rate (TRIR) to grade, compare and incent not only our organizational performance, but the performance of individuals. Our industry is not alone in this challenge. While a number of organizations within the Pulp and Paper Industry have moved past this barrier, the prevalent cloud of its past misuse remains ingrained in our culture.

For those in the safety profession, the challenges faced regarding this very specific number have been daunting and exhausting to say the least. While it is recognized this regulatory measure provided useful statistical data to the Department of Labor, it is likely OSHA forefathers never anticipated the albatross the TRIR rate would become, or that it would become one of the most hijacked, misused, and manipulated statistic of all time. For safety professionals charged with interpreting a recordable injury, the statistic became one of the murkiest interpreted of all measures even though its criteria are very black and white.

One of the most disillusioning statistic in recent years is the false premise of what was believed to be an indicator of a strong safety performance ... the Holy Grail ... a sustained period of ZERO RECORDABLES. However, when analyzing site Serious Injury & Fatality (SIF) incidents, recent studies have identified no correlation in SIF occurrence between locations with low TRIR and those that experienced higher incident rates. Yes, you are reading that correctly ... over time, facilities that have zero or low incident rates are experiencing SIFs at a rate comparable to sites with higher TRIRs. This is significant in light of many of our organizational systems that focus attention and improvement methodologies on facilities with higher TRIR. By design, we have removed the focus from facilities with few or zero recordable incidents. In reality, instead of using TRIR to manage our safety efforts, we should be measuring a site's organizational capacity and the strength of their risk management systems. Simply put, what we incent, grade, and compare MUST be our capacity and system strengths versus relying on our self-reported - OSHA mandated - documented failures.

Continued on pg 3

Continued from pg 2

Let's test this philosophy with a comparison of how this data is commonly used today. Answer the following million-dollar question. Given organizations with similar population, risks, and resources, **which of the following sites is safest when comparing their 2017 OSHA TRIR rate?**

Site A: 3.45 TRIR

Site B: 0.00 TRIR

Site C: 0.98 TRIR

If you believe the question is in fact a trick question, it may only be because this article has prepared you for what is a reality. It is simple to illustrate the influence and manipulation that occurs intentionally and unintentionally every day. For the purposes of this analysis, we are going to assume all three sites are not intentionally manipulating the numbers. So, what is your answer? If you have been relying upon TRIR, as many have for the last decades, you will likely lean towards Site B as the best performing site in safety and Site A as the worst. This may appear obvious because the higher ratio of injuries to employee hours indicates more medical treatment is occurring at site A than B. If your answer is that you do not have enough information, you are on the right path to understanding the intent of this article. But for the consummate safety professional and thoughtful leader, the answer is very quickly "the TRIR rate alone gives you little to no understanding of the site's safety performance capabilities." To understand why, let's look at some additional context about each site.

Site A: 3.45 TRIR

In 2015, the site initiated and rolled out a comprehensive leadership approach using human organization performance methodology. Its primary goal was a reduction in SIFs and to identify precursors and eliminate high risk gaps.

The site only tracks TRIR for annual reporting purposes for OSHA. The site does not use TRIR for a goal, performance bonus, incentive, comparison, grade, or as a measure of safety excellence. Leaders view a soft tissue recordable that was caught early as a positive indicator, believing that an employee may receive medical treatment resulting in a recordable, but likely preventing a rotator cuff surgery in the future.

In addition to an experienced and competent 20-year industry safety professional, the site has a General Manager that experienced a site fatality early in his career after having a string of three years without a recordable incident.

The site's key safety goals for 2017 were:

- Complete separation of powered industrial trucks and pedestrians in ALL areas of the site, not just allowing a focus on warehouse traffic. To accomplish this a site logistical study was conducted, engineering controls were put in where the two types of traffic overlap, significant management system improvements were implemented, and auditing of those systems is ongoing.

- A significant capital project kicked off modernizing the site's 40-year-old rewinder where countless SIFs had occurred sporadically over a four-decade period.

- Trend analysis indicated 50% of the injuries experienced were soft tissue related, so an Industrial Athletic Trainer was contracted to target early intervention, implement a proactive ergonomics focus, and conduct a significant amount of wellness training.

Continued on pg 4

Continued from pg 3

The site had 6 recordable injuries.

- A back injury resulting in 16 lost days from an employee slipping down wet stairs.
- A hand laceration resulting in 3 stitches received from an unforeseen nail on a shipping container.
- Employee visited Athletic Trainer (AT) with soreness in lower back. AT provided cold/heat therapy and prescribed stretching exercises to expedite the recovery. Based on the exercise treatment the injury was a recordable.
- An employee slipped and fell in the parking lot. Site leadership immediately took the employee to the doctor to be evaluated. X-rays indicated there were no breaks but to help reduce swelling, the doctor prescribed a 600 mg anti-inflammatory medication. The site had 400 mg over-the-counter (OTC) doses in their first aid room, but the site leaders long ago had abandoned the need to manage medical care or “self-doctor.” Instructions were not provided to persuade the doctor from giving prescriptions or a need to ‘manage’ around an injury to avoid a recordable record. The fact that the employee was taking 600 mg of ibuprofen versus 400 mg had no impact on the root cause of the incident or the ability to prevent it. Site leadership did not believe that they knew better than a doctor on care management and to do so would be contrary to every mission, value statement or vision policy posted on conference room walls across their job site.
- An employee visited the AT after being assigned a new job where they had to lift material above their head many times a shift. The employee spoke of moderate muscle pain in the shoulder and upper arms. The AT noticed that certain new muscles were being used and needed to be strengthened to help the employee avoid pain and tearing. The AT gave the employee resistance bands and showed the employee how to use the bands to strengthen their muscles required for the new task. The AT also gave OTC ibuprofen. Because the AT provided resistance bands, which equated to exercise instructions needed to strengthen and condition, the treatment was recorded because it was not on the OSHA list of first aid.
- An employee had an allergic reaction to a bee sting in the woodyard. The employee missed the next day of work to recover and to allow swelling and discomfort to go down.

Site B: 0.00 TRIR

The site had two years without a recordable injury. The site’s safety professional was new, and the General Manager was very involved in the determination of recordable injuries. The General Manager required the safety professional to be in the exam room every time someone sought medical treatment. They had several workers’ compensation cases but would always manage to eliminate the need to record anything based on the General Manager’s own interpretation of the recordkeeping requirements.

The site has several key metrics around TRIR rates to include incentives for achieving zero recordable incidents within a department. The site provides a steak dinner for department teams that are able to work a year without a recordable incident. In 2016, the site presented jackets to all employees for experiencing a year with zero recordables.

Continued on pg 5

Continued from pg 5

- The site truly and sincerely shares a message that the company cares about employees and their efforts in safety are to drive injury free results and get their fellow workers back home safely. The General Manager is well respected, truly cares for the employees, and is recognized by the company as a good and solid leader.
- One of the site's key system gaps is its limited capacity around incident investigation and root cause analysis skills. And frankly, with such good incident rates they have not had much practice. Though they do have many near misses, some serious, they are not performing a deep dive or rooted cause review. They have recognized from an online benchmarking seminar that tracking near misses is important, therefore one of their annual goals was to collect more. And just like all other safety incentives, they have taken it seriously and have increased near miss reporting by 300% in 2017.
- The site's annual plan aligned closely with the corporate goals:
 - Lower hand lacerations
 - Improve near miss reporting and tracking
 - Track employee involvement in Behavior Based Safety programs
- Shortly after posting their second consecutive 0.00 incident rate for a calendar year, on February 12, 2018 the site had a SIF occurrence. An employee's arm was pulled into a nip and amputated at the shoulder. After company safety professionals investigated, rooted issues in Management of Change (MOC), allowing increased access to the hazard and a 1960's era equipment design allowing an exposed in-running nip were identified.

Site C: 0.98 TRIR

- The site has a very old school General Manager who has always gotten results with a punitive approach to safety discipline. Of the last five employee reprimands for safety, four were given after an injury had occurred.
- The site had only two recordable incidents – both were SIF classified injuries:
 - A maintenance employee sustained multiple broken bones after a fall from an elevated work area while trouble-shooting an issue at 2am that was causing down time. The employee was disciplined for not following the written fall protection program.
 - An employee received 30 stitches when he walked around a blind corner in a warehouse and his upper thigh was struck by the forks of a powered industrial truck. "Employee inattention to surroundings" was identified as the root cause.
- The site has many of the best written policies in their company, but they are almost verbatim to the OSHA standards and are a statement of policy - not a management system. The policies are well communicated, employees have access, and are typically linked to employee misconduct after an injury. The site has very little employee engagement and attendance at the central safety committee meeting has been nicknamed the "root canal hour."

Continued on pg 6

Continued from pg 5

Provided the site scenarios and only a little more information, it's clear that evaluating safety by TRIR alone is misleading. What appears to be the worst performing site (A) has the mature culture and more system capacity than both of the other locations. Site B would have likely received the least attention in a typical comparison. However, the site has a lot of low hanging SIF potential precursors that could be identified by basic safety evaluations or root cause analysis of their serious near misses. But because there were zero recordables, senior leaders instructed resources to attend to other sites with higher TRIRs. The site with the TRIR performance in the middle (site C) most likely had the poorest safety culture. They appear stuck in the dark ages with a philosophy that discipline had a positive impact on safety, which resulted in a cause and effect culture where incidents were not reported, management was not trusted, and employees rarely became engaged!

You likely predicted the skewed results of each site based on the start of this article. But if you believe that these three scenarios do not represent real life situations and are extreme scenarios used to prove a point - you would be wrong. Chances are you're lucky to not have had the hard-earned lesson of the site leader who stood on the edge of a gravesite in the company of a spouse and children of a deceased employee. Who has the lowest TRIR, how our TRIR compares to others, or if we receive a bonus attributed to a TRIR is inconsequential if we continue to have SIF incidents. Sadly, at a micro level, the incident rate does not have the significance we once thought it did. And the gut realization that all of the collective effort, energy, and manipulation used to manage that number to zero took our eye off the real goal and continues to do so today.

What truly matters is the elimination of serious, fatal and life changing injuries. Of course, no one wants any injury, including those requiring minor care. Therefore, we should investigate with rigor and put in controls to prevent their occurrence. But it is paramount that when given our risk, the challenge of fast paced technology, increased turnover from an aging workforce, limited resources, the drive to become more competitive – we must focus on the higher risk first and not waste time on engaging and distracting our limited resources on managing and manipulating a number that does not indicate safety performance on a micro level. In certain instances, such as early intervention of soft tissue injuries, a recordable incident may be a positive metric of holistic prevention! While this discussion on the manufacturing industries reliance on and the significance of the Total Recordable Incident Rate may have struck a nerve, to ignore the argument and disregard the challenge this article sets forth could stall our industry progress towards serious injury and fatality prevention.

Let's focus on some industry comments in recent years.

A veteran safety professional- *I've worked for many site leaders and thankfully today, my current leader gets it! I once worked for a leader who said he would decide what is and isn't a recordable. He also insisted I try and get into the doctor's office to explain we have OTC medications on site and to encourage the doctor not to restrict work because we will let the employee take it easy. I am so happy where I am now, and I avoid wasting hours stressing over minor things or trying to be a doctor...I can now focus on really impacting safety.*

Continued on pg 7

Continued from pg 6

A corporate safety professional- *After acquiring a new company, I was hearing a lot of chatter on conference calls about ‘avoiding’ recordables. The energy was around how to avoid a recordable ‘after’ an injury and very little about root causes and prevention. One of the sites was really vocal about the effort they made to keep treatment in house and avoid a doctor because they had a nurse. I arranged a conference call with the site (General Manager, Safety, and medical staff) and as a responsible leader from the new legacy company, I became very direct and explained as a part of our new company we expected ALL injuries to be recorded by the book. I insisted the regulations and interpretations were very clear and precise, and it was an expectation not to manipulate the numbers. I encouraged them to focus more on the prevention before someone went to the doctor versus trying to be doctors themselves. I was very respectful and made it clear I was there to support them and my effort to be direct on the subject was to help them be successful. After the call, the site nurse called me personally, crying and thanking me. She explained she had been asked on many occasions over the years not to document portions of the actual treatment given so that they would avoid a recordable. She advised this was very much in conflict with the way she was taught to document and detail. I assured her those days were over and thanked her for her thoughtful support.*

A recently hired Senior Operational Leader- *I transferred from an industry competitor that was very focused on Human Organizational Performance and Human Factors and the company had long since abandoned the internal use of TRIR. Within the first month of working for my new company, I heard that the company CEO wanted to be at the top of the industry related to TRIR. I understand he wants to be competitive but believe he demonstrated a failure to understand what TRIR was designed to measure. Very frustrated to take a step back in safety philosophy, and I’ve now come to recognize that many of our Senior Leaders really don’t get it!*

A facility General Manager- *I’ve always felt like the emphasis we put on TRIR was hypocritical. At times when we were really working hard on safety focusing on engagement and management systems, I was still getting tons of pressure from Senior Leaders to do more because we had a few recordables, none of which were serious. Then at other times, when I had a zero, no one bothered me. It felt good to be out of the spotlight, but eventually we started getting complacent and had more serious near misses, but no one was looking at those. As I have matured as a leader, I have ensured I have strong safety resources, good employee engagement and all my leaders working on high risk systems. I deflect the focus on TRIR from the outside away from our employees and just do the right thing. But I still have that TRIR looming over my head with no real consideration to what I am really doing on site. I also have a really hard time getting capital money just for safety when there is no return-on-investment. The corporate group hammers me for a few minor recordables but when I explain I need capital to update aging hazardous tanks, their safety hammer vaporizes!*

If you have been in a site safety or key leadership role for more than a decade, it’s almost certain you have heard or lived these examples. And to be kind, we have left out many examples of misuse and manipulation of TRIR, where the decision was unethical and willful and often times affected the potential to receive awards and monetary bonuses. The saddest part of all, is that these decisions were self-inflicted using a TRIR measure that was never intended to be used at a micro level. And, in most cases where the number was manipulated, there was an unintended cause and effect - one where leaders at all levels had no intention of creating a barrier and certainly cared about people and an improvement in safety. Whether it’s unintended or willful, in order for true and effective safety practices, systems and culture to grow, the practice must stop.

Continued on pg 8

Continued from pg 7

Reliance on a TRIR rate can be an emotional topic. As such, it is imperative to summarize the critical talking points and identify the key call to action.

- The challenge with TRIR is not a Pulp & Paper Industry challenge...it is an inherent barrier in all industry. However, our goal is to move our industry past this barrier and to be the leader of all manufacturing related to solid safety results and continuous safety improvement.
- In the majority of cases where TRIR has been used improperly to incent, compensate, grade, and compare our safety strengths, there was no ill intent. The motivation has been to help drive safety improvement. For most of the last two decades, awarding pizza parties, jackets and other incentives was a benchmarking best practice to help drive better safety performance. We have all done it, we were all trying to help. But as TRIR rates dropped off, improvement in the number of SIFs has flat lined for more than a decade.
- This article does not diminish the importance of a site which has sustained zero recordable incidents. Low incident rates can be a positive indicator, especially when the rate consists of low severity cases. Rather, the article's message is to ensure that our industry understands that solely relying on TRIR may lull one into a sense of complacency, missing SIF precursors that might exist. In addition, this article serves to demonstrate ways in which a hyper focus on TRIR can be a potential barrier to understanding authentic safety performance. This may cause leaders to waste time and energy, or worse, exercise poor judgement in the interest of protecting the site from outside consequences when they experience recordable injuries.
- It is not our intent to say **not** to measure TRIR. First of all, it is not our number to give and take. Secondly, it is a regulatory requirement. TRIR is likely not going away, and annually we must continue to report our numbers. But the first step in recognition of our misuse is simply to understand that the original intent of the TRIR was for macro statistical comparison of industries. It determined OSHA funding and was used for targeting regulation and resources. That's it...period.
- In reference to discipline, it is not the intent of this article to debate when and how discipline should be used. In some cases, it is necessary, prudent, and even referenced in OSHA standards in order to enforce compliance. The references within this article are used to illustrate the harm that unhealthy use of or the significant value some leaders believe employee discipline has on improving safety. Some have been applying discipline for decades with an iron fist. Where have the SIF improvement results been if it's truly helpful? Appropriate discipline should be applied where applicable, but only when human performance factors are weighed within the review of the incident, root cause analysis has been completed, and a true look in the mirror for shared just and fair accountability have been evaluated. It is critically important to have a far higher ratio of "pre-incident" discipline than "post-incident" discipline to ensure fewer barriers to incident reporting.

In conclusion, over the past three years, the PPSA has systematically taken steps to remove our own recognition and awards programs that have targeted lagging indicators, and are replacing them with employee engagement, leadership, and management system best practice recognition. We will continue to do so, but now we implore all within the industry to join our cause, an industry **Call to Action**.

Continued on pg 9

Continued from pg 8

- We ask that all industry companies and supporting associations that are still using TRIR inappropriately to stop using TRIR measure to incent, grade, or compare a company, division, or site's safety strength. Using the TRIR number to compare your company's strengths against a competitor is not helpful, and just like the three site examples given above, may falsely direct you to or away from benchmarking a better company. We encourage companies to track solely for its intended purpose and replace the lagging metric with high severity metrics and leading metrics that identify SIF precursors, measure employee engagement, and specifically target demonstrated leadership activities at ALL levels. This includes not using TRIR for monetary bonuses, prizes, or any perceived carrot that is dangled and then taken away when a failure occurs. Simply **STOP** measuring performance by failures, and **START** looking at capacity and system strengths. Focus on high risk activities with continuous improvement in applying multilevel engineering and elimination controls. This includes removing location signage that indicates "days without an injury" – as that number increases, it often leads to suppressing incident reporting.
- We ask industry senior leaders to seek to understand how misuse of TRIR has affected your company in the past and present. We encourage open debate in a non-threatening atmosphere where leaders at a site level can share the dynamics and influences when the measure is used inappropriately. Listen to your competent and trusted safety professionals who have worked in and around this barrier for decades. Collaborate with the human resources function to align performance management, recognition, and reward systems towards leading indicators.
- For companies who have already abandoned this misuse and overemphasis, reach out to fellow competitors, and help guide them to remove this self-induced barrier which can have an unintended cause and effect. For those most mature amongst our industry - share your testimonials regarding how you care about employees' quality of life. Advocate the use of medical resources, early intervention of pain and discomfort and err on the side of caution to ensure employees receive quality care directed by healthcare providers. Encourage colleagues to do all these things in good faith, even if that compassion comes with tipping the scales of compliance with a need to record even a very minor injury.

A final thought from a 25-year industry safety professional- *The day I can just care about an employee at the moment they have an issue (pain, medical concern, injury or potential re-aggravation of a personal injury) and just help them get medical attention without the albatross of negative consequences hanging around my neck...I will likely go to my office, close the door and really just have a good cry. No one really understands how we are conflicted to always do the right thing when we could be admonished for providing reasonable care. Why can't we provide a level of medical treatment that exceeds all abundance of caution while showing compassion for a fellow employee? The cost is inconsequential compared to the long-term credibility damage we cause when managing a case to avoid the OSHA recordable threshold. I am just exhausted playing the recordable game all these years.*

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- The discussion will focus more on the “how to” than on the what HPI is.



Space for the workshop is limited. If you would like to attend, please register early. Special registration rates are available for PPSA Members and those who attend both the 2019 annual conference and the HOP/HPI Course. For Registration and course information please click [here](#). If you plan to attend, please send questions in advance to info@bushcohipi.com. Also, please send your current implementation plans in advance or bring them with you.

To register for this course please contact PPSA at info@ppsa.org

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Join PPSA's new Contractor Committee!

In the interest of PPSA's mission, *Bringing the Industry Home Safe*, we are proud to announce the formation of the Contractor Committee. For their obvious partnership in the success of our industry, PPSA would like to offer this new opportunity for participation, education, and membership opportunities to our industry contractors.

The contractor committee will work unilaterally with other committees (Education, Membership, Communication, and Awards) to fully develop a valuable membership experience for industry contractors.



Join this committee to explore and support opportunities to improve contractor focused safety within our industry through the following avenues:

- Training and Education
- Webinars and Workshops
- Annual Health & Safety Conference
- Benchmarking & Innovation
- Professional Growth and Networking with Industry Peers
- Awards & Recognition

Committee Chair: Matthew Kanneberg, WestRock



To join this committee please contact PPSA at info@ppsa.org

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Case For Safety

Dick Jackson
Director- Contractor Safety
International Paper

Have you ever sat down and thought about why safety is important to you? I never really did. Until one unfortunate day a few years ago.

My goal as a mill manager was to never lose someone on my watch. Then it happened. Like many serious injuries, the combination of minor shortcomings and errors happened to align. With one less failure in the system, our team member would still be with us today.

This event impacted me greatly, but it doesn't compare to the mark left on his family. I think about my own family – my children who chose to follow my footsteps into the paper industry. If something were to happen to them, how could I live with that? How could I look my wife and their mother in the eyes?

This is my case for safety and why I work safely, and influence others to work safely every day. There is nothing more important than sending our team members home to their families the same way they came in.

I am proud that my 35 year career has been in the paper industry. We are a manufacturing industry that makes products people depend on from renewable resources. Most of our facilities are in small, rural towns generating the best middle-class jobs, and making up a large portion of the tax base. Our people are actively involved in the communities where we live and work to make them a better place.

Unfortunately, our safety record isn't something we can be proud of yet. We have come a long way – when I started years ago we weren't required to wear steel-toes, safety glasses, ear plugs and didn't have a lockout tag, much less a personal lock. But, until we are sending everyone – colleagues, contractors, visitors – home injury-free, we can't be satisfied.

As safety leaders, we can make the change. Safety is like anything else, there is a science to safety. Fundamentally, we need robust systems, procedures, and engineered solutions for safety. These are the "brains" of safety. However, these alone will not ensure our teammates are injury-free. We have to equally focus on the "heart" of safety. This is what motivates us to do the right thing, guides us subconsciously and reflects our care for one another.

Our people deserve great leadership. So, take the time to think about your personal case for safety. It's not because it is a scorecard metric, or a requirement from management. You care about safety because you care about your people. I see young managers struggling with production pressures and leading new teams. Share your case for safety with them. Share it with those who have been with the company 20 or 30 years, and ask why safety is important to them. Connect with others through powerful testimonies. This is what will help us become an injury-free industry.

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DOT HazMat Awareness
Hearing Conservation
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Lessons From a 1,200 fps Mistake

How does an errant shot from a cop's gun relate to safety leadership in the pulp, paper, tissue, and converting industries? It's as simple as CSMR.

TIM D. KECK



The undercover narcotics officer approached the suspect's vehicle in the dark at a rapid walk, gun drawn, shouting commands. He had just witnessed a methamphetamine deal and intended to make an arrest before the bad guy could draw a gun or drive away. The suspect locked the doors and tried to start the engine. To avoid a high-speed chase, the officer knew he'd need to break the car window.

Still covering the suspect with his pistol, he drew a collapsible baton with his other hand and struck the window. Nothing. He struck it again, but the baton just bounced off as the engine roared to life. Gripping the baton as hard as he could, the officer began to swing a third time when the window suddenly shattered. It took a moment for him to realize that the window broke because of the 9mm round he'd just accidentally sent through it.

Fortunately for all concerned, the bullet missed the suspect and passed through the floorboard into the ground. But how could this have happened? As this detective's supervisor, it was my responsibility to ensure his safety training was state-of-the-art. The after-action review of the event

revealed two things that happened under the officer's high levels of stress:

1. A substantial increase in the tendency of one hand to mirror the actions of the other.
2. Loss of his ability to feel his fingertips.

So, when the officer gripped the baton tightly with his left hand, his right hand automatically tightened on the pistol. The numbness in his fingers didn't allow him to realize his index finger had slipped onto the trigger.

Our young detective had almost shot a guy. There would be a reckoning.

The good news is you can benefit from the lessons we learned. We developed a stress-proofing model to help officers perform under stress. It's called CSMR, and it can work for you.

MAKING CSMR WORK

Whether you are assigning jobs on the mill floor, overseeing a facility-wide initiative, or trying to get folks to use proper safety equipment and practices, there are always obstacles to overcome. CSMR enables you to avoid some of the most common excuses for lack of performance or compliance: I didn't understand what you wanted; I didn't know it was that important; Somebody told me something different.

Here's how CSMR works:

Clarify: Be crystal clear about whatever "it" is. A great leader brings clarity to any situation by filtering out the noise until only the key point remains. She does this by asking clarifying questions like "What is the ultimate purpose of this effort/project/meeting/initiative?" or "What are really we trying to accomplish?"

Simplify: Once the answer is obvious, make it easy to understand and execute by reducing it to its simplest form. Being

concise is far more difficult than one might think, but it forces us to truly comprehend the core message behind all the verbiage. Einstein said that if you can't explain it to a six-year-old, you probably don't understand it yourself.

Magnify: When dealing with important issues under higher stress levels, it's very easy to forget what truly matters about the task at hand. This step ensures that we keep what's really important at the forefront of everyone's mind. We communicate it often and in different ways, we reward it, we tell stories about it. We make certain everyone knows what matters most and why.

Repeat: Once people have utter clarity around purpose and strategy, things have been simplified so that they are easily actionable, and we've made the main thing the main thing, we will be motivated to do more of the same. Constantly seeking to clarify, simplify, magnify, and repeat will help you win battles you never thought winnable.

I challenge you to begin applying this methodology to everything you do. If you don't and your people get hurt because you failed to make things clear, or easy to understand, or to help them know what's truly important, you could get your own version of a bang when you don't want a bang. And there will be a reckoning. 🚨

Tim D. Keck is a best-selling author, a top-rated speaker, and an expert on leadership and teamwork under stress. A former career police officer and SWAT leader, he has testified before a Congressional committee, provided VIP protection, and appeared on national television. He will be sharing leadership wisdom at PPSA's Annual Conference, June 23-26, 2019 in San Antonio, TX. <http://ppsaconference.org>.

*This Article was originally published in Paper360's, March/ April Edition, 2019



**Save the Dates for these
Upcoming PPSA Webinars!**

April 11th 2:00 pm— Winder Safety

**Missed a recent PPSA webinar? Want to stay up to date?
View recordings and access other safety resources [here!](#)**

Stay Tuned!

PPSA is planning a webinar around catastrophic emergencies preparedness and as well as planning to have presentations on this subject at this year's annual conference.





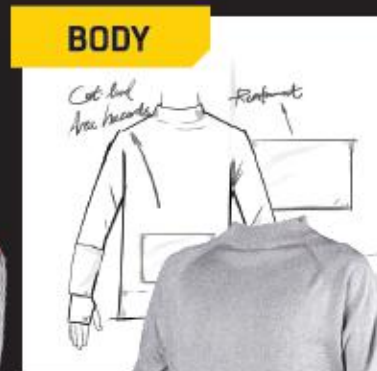
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Creating a Connection to Safety

Member Spotlight: Linda Bruce, Westrock



Linda (pictured second from left) with her family.

Linda Bruce began her career at WestRock through a contract role at the Covington, Georgia, container facility, where she helped develop presentations to present to customers such as Coca-Cola. After her contract ended, she was asked to join the team full-time in a position on the Quality team at the plant. From there, she held a role in Customer Service and ultimately found her way back to her passion that was initially sparked by her time as a nurse in the U.S. Navy, something that touches every single one of our employees – safety. Today, she's known for finding ways to make safety not only relatable and top-of-mind, but also fun!

During her time in the U.S. Navy as a nurse, Linda witnessed several life-changing events and experienced the magnitude of how quickly someone's life could change due to not performing a task safely. In her current role as regional safety manager for the Corrugated Container Central Region, Linda provides guidance on how we can continue to make our work environments safer for all employees. This involves implementing safety initiatives, injury investigations, corrective actions, and regulatory compliance. She's found joy in finding creative ways to connect with employees and relay the importance and impact of safety to WestRock team members on and off-the-job.

"To me, safety means being able to come to work in a safe environment and return home to our families safer than when we left for work. I think it's critical to connect with safety on a personal level. There's always something or someone depending on you to come home safe, and that's a huge driver of us all to work safely. Sometimes making an impact when it comes to safety can take you out of your comfort zone. I'm a creative thinker, so if it takes developing a Personal Protective Equipment (PPE) rap song or hosting a safety costume dinner to get safety to stick, I am all in. It's important to make these events something that people can connect with and will remember!" shares Linda.

Continued on page 29

Continued from page 28

Linda has worked on several projects such as developing the criteria for division-wide Kaizen events with both employees and customers. This involves digging into how to create solutions or put parameters in place for areas where injuries have occurred to reduce risk and create awareness. Customer visits also allow Westrock to show firsthand a strong commitment to working safely to produce high-quality products for their customers on time, every time.

Get to Know Linda off-the-clock

What aspect of your role do you enjoy the most?

Definitely the relationships I build and the chance to help employees understand the connection of safety to our overall business strategy. I have also had the opportunity to work with some great leaders who are committed to employee safety and provide support to ensure our employees go home safe. This is a huge key to being successful in safety.

What makes you feel like a kid again?

Hanging out with my daughters and grandkids. I have one daughter that is 33 and has my two grandkids, ages eight and seven. I also have a 17-year-old daughter who keeps me running – and broke!

What are the top three items on your bucket list?

I don't know that I really have a bucket list... but my retirement dream is to own a small home on the lake with a bait shop on the dock where I can provide free coffee and safety advice for all the fishermen.

Safety Alert– Recall on Eaton Heavy Duty 30A and 60A Safety Switches

Important Product Safety Bulletin Eaton Heavy Duty 30A and 60A Safety Switches

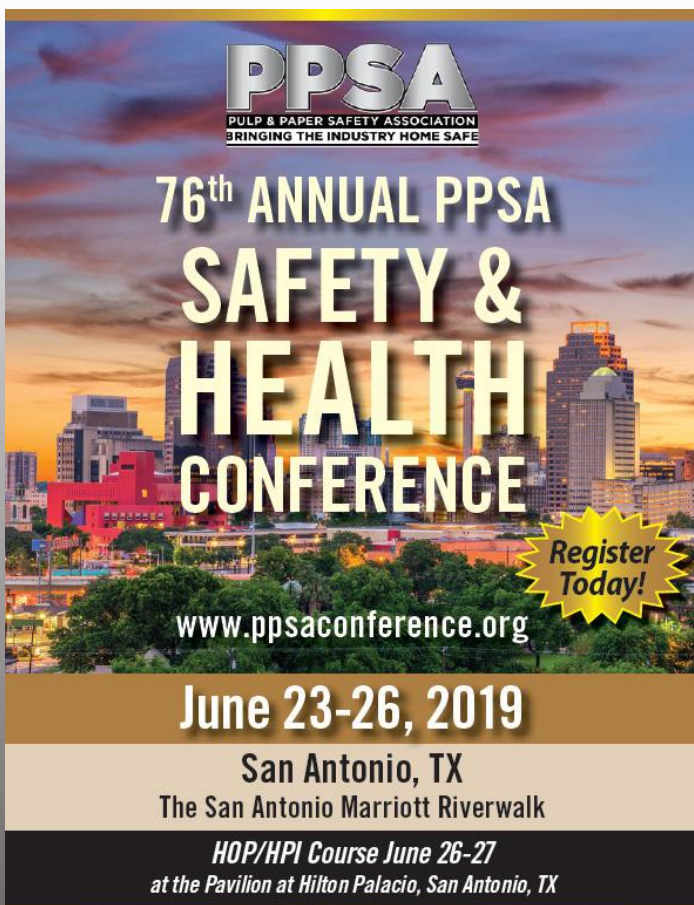
Eaton has identified a potential nonconformance with certain Eaton Heavy Duty 30A and 60A Safety Switches. The safety switch can potentially supply power when the handle is in the "off" position, subjecting the operator of the switch or any downstream equipment to risk of serious bodily injury or death.

This issue affects various configurations of 30A and 60A Heavy Duty safety switches manufactured between November 19, 2015 and January 23, 2018.

Electronic copies of the notice that may be downloaded and forwarded are available at www.eaton.com/hdss-advisorybulletin.

Consumer Contact:

If you need any assistance determining if your product is affected, please contact Eaton at HdssAdvisoryBulletin@eaton.com



The poster features the PPSA logo at the top, which includes the text 'PULP & PAPER SAFETY ASSOCIATION' and 'BRINGING THE INDUSTRY HOME SAFE'. Below the logo, the main title reads '76th ANNUAL PPSA SAFETY & HEALTH CONFERENCE' in large, bold, white letters. A yellow starburst graphic with the text 'Register Today!' is positioned to the right of the title. The background of the poster shows a city skyline at sunset. At the bottom, the website 'www.ppsaconference.org' is listed, followed by the dates 'June 23-26, 2019', the location 'San Antonio, TX', and the venue 'The San Antonio Marriott Riverwalk'. A black banner at the very bottom contains the text 'HOP/HPI Course June 26-27 at the Pavilion at Hilton Palacio, San Antonio, TX'.

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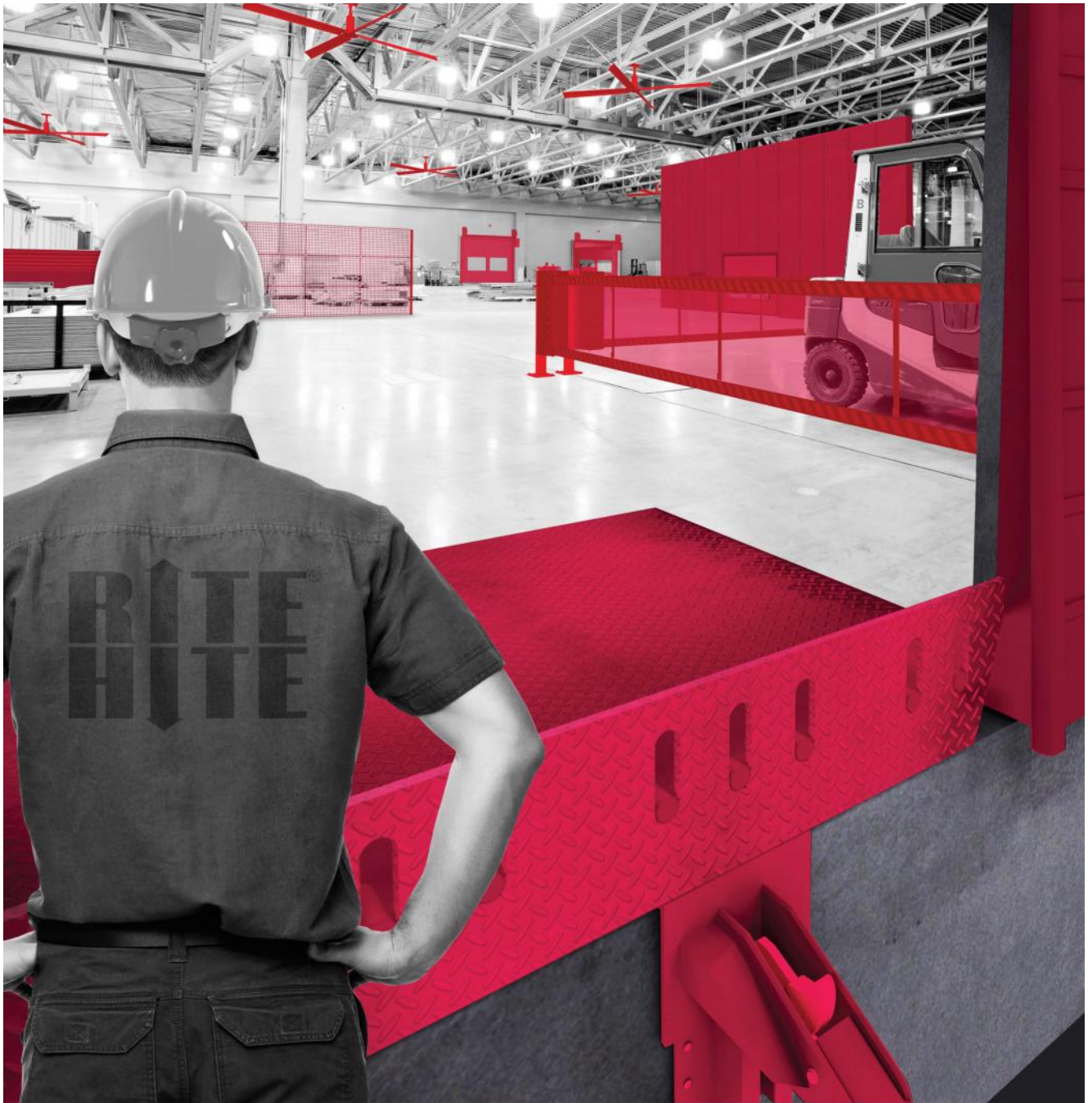
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PPSA Committees

Below is an update of the current Board members, roles and responsibilities of the PPSA Committees. Everyone on these committees volunteers their time to provide the most beneficial services for all members. The Association appreciates their dedication and support which could not be without the support of each of their companies. An asterisk (*) next to a committee member's name designates an association member serving on a committee.

Executive Committee - paul.bierley@domtar.com

The Executive Committee responsibilities include Financial Committee and reviewing PPSA's accounts and annual budgets.

Members: Paul Bierley, Domtar (Chair), John Deveau, WestRock, Steve Gearheart, New-Indy Containerboard, Randy Adams, Kruger, PPSA Staff

Current Activity: Reviewing the financial needs of the association to maintain overall stability. They continue ensuring the association operates within the current bylaws, and are evaluating bylaw modifications to sustain the effectiveness of the organization.

Conference Committee - steve.gearheart@new-indycb.com

The Conference and Sponsorship Committee is responsible for planning the annual professional development conference and managing the sponsorship for the conference.

Members: Steve Gearheart, New-Indy Containerboard (Chair), Paul Bierley, Domtar, John Deveau, WestRock, Tim Elizondo*, WestRock, Matthew Kanneberg, WestRock, Shawn Powell, Brady Corporation, Pete Masias, Green Bay Packaging, Randy Adams, Kruger, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Evaluating and planning the conference agenda, securing speakers for selected topics and developing conference events.

Membership and Vendor Committee - randy_adams@ktgusa.com

The Membership and Vendor Committee is responsible for developing, tracking, and increasing both company and vendor PPSA membership.

Members: Randy Adams, Kruger (Chair), Paul Bucek*, Green Bay Packaging, Paul Bierley, Domtar, Sally Boven*, Reflective Apparel, John DeVeau, WestRock, Tim Kubly, Rite-Hite Corporation, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: This committee looks for ways to enhance member satisfaction and the overall value of a PPSA membership including providing our membership access to safety vendors with state-of-the-art technology, products and services. The committee is also currently working to attract more contractor companies to the association.

Educational Development - larry.warren@domtar.com

The Educational Development Committee is responsible for developing courses for PPSA members and non-members.

Members: Larry Warren, Domtar (Chair), Matthew Kanneberg, WestRock, Larry Kilian*, Haws Corporation, Shawn Powell, Brady Corporation, Dick Jackson, International Paper, Brian Bork*, CR Meyer, Jeff Dalto*, Convergence Training, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Continued on page 33

Continued from page 32

Current Activity: The committee is working on several initiatives:

- finalizing and publicizing the details for upcoming continuing education opportunities such as course offerings and webinars
- seeking opportunities to leverage the educational capabilities and efforts of PPSA across the industry

Awards and Nominations - pmasias@gbp.com

The Awards and Nominating Committee is responsible for executing the awards throughout the entire year. It includes but is not limited to, the Executive Eagle, Distinguished Service, and Safety Committee/Team awards. This committee will also be responsible for recruiting and vetting new Board Members.

Members: Pete Masias, Green Bay Packaging (Chair), Steve Gearheart, New-Indy Containerboard, Randy Adams, Kruger Products, George Kolesar, Sonoco, John DeVeau, Westrock, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: The committee is reviewing the criteria of the current awards recognized at the annual conference and working on the potential addition of two awards to increase recognition of our members and sites.

Communications Committee - joy.ausman@clearwaterpaper.com

This committee is responsible for providing content for the various publications and non-event content outlets.

Members: Joy Ausman (Chair), Clearwater Paper, John Deveau, WestRock, Steve Gearheart, New-Indy Containerboard, Curtis James*, Austin Industrial, Kyle Breiner*, Domtar, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Reviewing the current Quarterly Report (QR) newsletter. They also have the responsibility for updating the website and soliciting articles for the next QR from members and vendors. We are looking at different means of social media to provide information and updates to our membership.

Contractor Committee - matt.kanneberg@westrock.com

This committee is responsible for providing content for the various publications and non-event content outlets.

Members: Matthew Kanneberg, WestRock (Chair), Dick Jackson, International Paper, Brian Bork*, CRMeyer, Ted Carroll*, Jacobs, Brian Donlon*, VOS Electric, Dean Kuhlman*, Thompson Industrials, Clint Thacker*, C&R Compliance, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Recruiting members for the committee and working to increase programming and representation of contractors within the association.

As a member of this association, you are encouraged to provide feedback to the committees either by contacting the chairs directly or contacting [staff](#). Please [contact](#) PPSA if you would like to join a committee as well.

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OSHA QuickTakes

March 20th, 2019

Volume 18, Issue 5

OSHA Requests Information on Powered Industrial Truck Standard

OSHA is requesting information as the agency considers rulemaking to update the powered industrial trucks standards. OSHA will use the information received to determine what action, if any, it may take to reduce regulatory burdens and create jobs while improving worker safety. Powered industrial trucks include forklifts, fork trucks, tractors, platform lift trucks, motorized hand trucks, and specialized industrial trucks powered by an electrical motor or internal combustion engines. Comments must be submitted by June 9. For details, see the [news release](#).

OSHA Team Receives Federal Government Performance Award

The Office of Management and Budget recently presented a [Gears of Government Award](#) to OSHA's Continuous Process Improvement Team. The award recognizes individuals and teams across the federal workforce whose dedication supports the exceptional delivery of key outcomes for the American people. OSHA was recognized for streamlining the approval process for the [Voluntary Protection Programs](#), the premier recognition program for worksites that show excellence in the use of safety and health programs.

OSHA Assists Tornado Recovery Efforts in Alabama and Georgia

In response to a March 3 tornado that caused severe damage in Alabama and Georgia, OSHA dispatched staff to help protect workers involved in recovery and cleanup efforts in the most affected communities. OSHA staff performed interventions, participated in safety briefings, distributed OSHA publications, and addressed key hazards including falls, struck-by injuries, and lack of personal protective equipment. OSHA's [Emergency Preparedness and Response page](#) offers more information on hazards and resources.

OSHA Alliance Partners Commit to Improving Worker Safety and Health

The National Institute for Occupational Safety and Health, state of North Dakota, and Bakken Basin Safety Consortium signed an agreement to promote safety and health in the oil and gas industry. The two-year alliance, which was signed by North Dakota Governor Doug Burgum, will use hazard alerts, effective training, and education programs to prevent workplace hazards. For more information, read the [news release](#).

Toledo Electrical Joint Apprenticeship Training Committee signed a [three-year agreement](#) to address hazards that apprentice and journeyman electricians may encounter in the construction and general industries. The alliance focuses on wind tower safety, photo-voltaic cell installation and maintenance safety, DC electrical systems, and electrical safe work practices.

The West Texas Safety Training Center signed a [three-year alliance](#) to help protect the safety and health of oil and gas workers involved in service, transmission, exploration, and production throughout West Texas. The alliance focuses on preventing fall, struck-by, caught-in/between, electrocution, and heat illness hazards by implementing best practices, improving safety and health programs, and increasing training.



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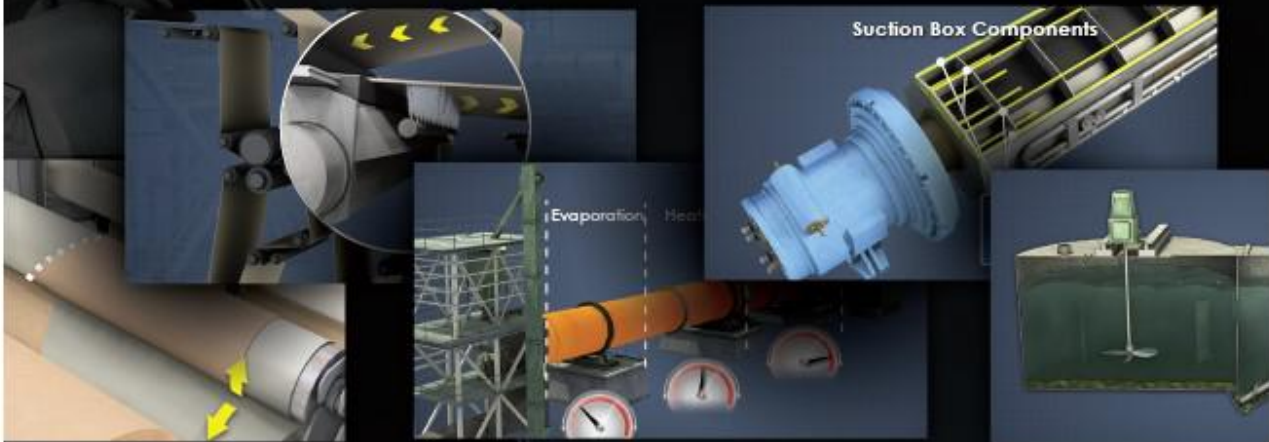


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SOME OSHA CASES OF NOTE IN 2018

By Eric Hobbs , Ogletree Deakins LLP

The year 2018 saw the issuance of several noteworthy federal workplace safety and health decisions. Three of those decisions came in the cases of *Secretary of Labor v. Angelica Textile Services, Inc.*; *Acosta v. Hensel Phelps Construction Co.*; and *United States v. Mar-Jac Poultry, Inc.*

Repeat Citation Burden of Proof. In *Angelica Textile Services*, the Occupational Safety and Health Review Commission clarified and reaffirmed the standard of proof for “repeated” violations: that an employer may rebut the Occupational Safety and Health Administration’s (OSHA) case of “substantial similarity” by showing (1) that the “conditions and hazards associated with [both] violations” were “disparate” or (2) that the employer “actively sought out and eliminated similar hazards” after the first violation. Previously, merely showing that an employer had been cited a second time under the same standard seemed, according to OSHA anyway, to meet its burden of proof. In short, OSHA had watered down the measure of “substantial similarity” considerably.

Controlling Employer. The U.S. Court of Appeals for the Fifth Circuit’s decision in *Hensel Phelps Construction* is equally significant. Before that decision, the Fifth Circuit (which has jurisdiction over cases arising in Louisiana, Mississippi and Texas) was the only circuit that had rejected OSHA’s position under its multi-employer worksite policy that the Agency can cite employers that are deemed “controlling”—that is, in the position to control overall safety on the worksite or abatement of a particular hazard, such as general contractors. After 37 years of holding that position, the Fifth Circuit reversed itself and concluded that OSHA has the authority to cite a controlling employer even if that employer’s employees are not affected by the alleged violation.

Although there are circuits that have not yet ruled on this issue, the Occupational Safety and Health Review Commission is likely to follow its own consonant controlling employer precedent in cases appealable to any federal circuit court or appeals. (Most state-plan states have adopted this position as well.)

Scope of Inspection. Finally, the Eleventh Circuit Court of Appeals’ decision in *Mar-Jac Poultry* is more limited in its scope, but is a clear win for employers. In that case, OSHA attempted to expand the inspection of a reported injury to a comprehensive (or wall-to-wall) inspection based upon (1) a regional emphasis program for poultry processing facilities and (2) OSHA’s review, during the injury inspection, of Mar-Jac’s 300 logs, which, according to OSHA, showed evidence of possible violations of the General Duty Clause of the Occupational Safety and Health Act of 1970 and OSHA standards related to ergonomic hazards, biological hazards, and struck-by hazards, among others. When the company refused to allow the expanded inspection, OSHA sought a warrant.

Initially, the federal court granted OSHA’s application and issued a warrant allowing the expanded inspection. However, when Mar-Jac moved to quash the warrant and presented its evidence, the magistrate judge changed his mind and determined there was no probable cause to issue the warrant after all. One of the district court judges adopted the magistrate judge’s recommendation and denied OSHA’s warrant application. OSHA then appealed that decision to the Eleventh Circuit based only on the 300 log argument, not the regional emphasis program argument.

The Eleventh Circuit agreed with the lower court. It found that “hazards,” as arguably identified on 300 logs, and “violations,” for which OSHA can cite an employer, are distinct concepts. “It is simply not the case that the existence of a hazard necessarily establishes a violation,” the court noted.

Continued on page 44

Continued from page 43

The court also held that OSHA must prove more than that a hazard may exist (which is what an entry on a 300 log shows at best) to prove that a violation occurred and thus establish probable cause for the issuance of a warrant. The court went on to observe that the mere existence of an injury, as reflected on a 300 log, “does not necessarily mean that the injuries were caused by OSHA violations, or justify the issuance of an administrative warrant for evidence of OSHA violations.”

The *Mar-Jac* decision is a favorable one for employers in the Eleventh Circuit and other circuits in which employers have the opportunity and right to an evidentiary hearing. Unfortunately, employers do not have that right in all circuits. Therefore, employers must be careful and deliberate when analyzing the circumstances of a particular case and refusing to allow an inspection that OSHA has decided to expand—or any inspection by OSHA, for that matter.

This article is intended to inform readers of recent developments and issues to consider in the field of workplace safety and health. It is not legal advice and may not be relied upon in determining whether a facility or activity is in compliance with applicable legal requirements.

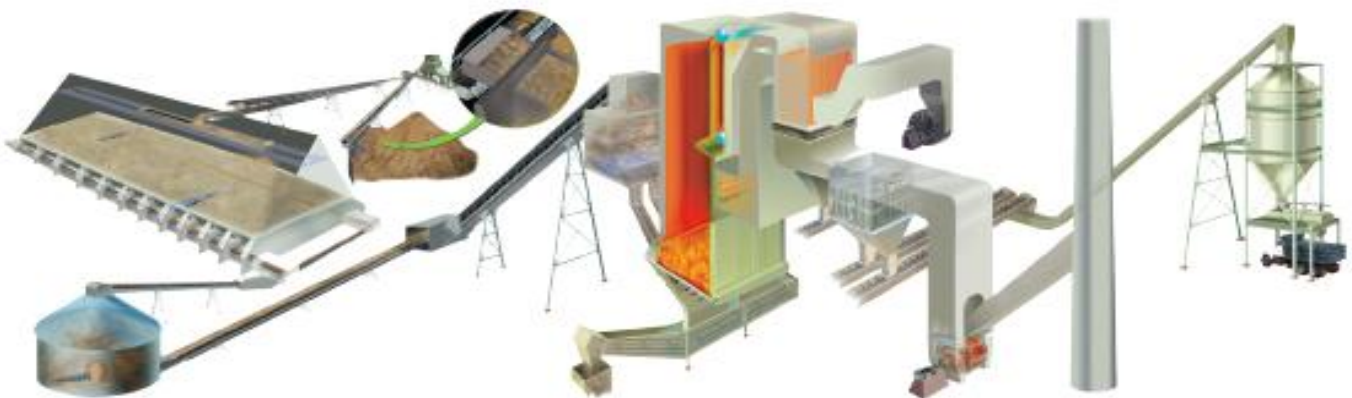
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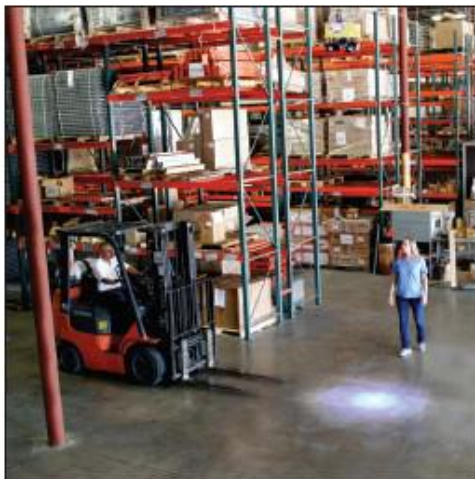
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About PPSA

PPSA is a non-profit, non-political, international organization, devoted to safety throughout the pulp, paper, and forest products industry. From forest products to paper mills, to converting plants, to recycle collections centers, our membership is grouped by category to ensure a fair and appropriate basis for comparison.

The association began in the 1940's as the Southern Pulp and Paper Safety Association, later changing the name to reflect our widening membership base. We currently have members throughout the United States, Canada and other countries. We work to promote safety, to set reasonable and attainable goals, to educate our members, and to give those members a forum for discussion.

Membership in the Association is categorized by operating facility, such as a paper mill, box plant, sawmill, woodlands, etc. Approximately 380 operating facilities are currently PPSA members. We also welcome supplier members to join PPSA and we plan on extending membership opportunities to contractors that provide services to the companies in our association.

Membership in the Association has many advantages:

- The Pulp and Paper Safety Association is the ONLY national organization exclusively concerned with accident prevention in the forest product industry.
- The Association is an excellent forum for keeping up with latest OSHA standards. In-depth information on specific subjects is increasingly available at regional seminars. The cost of these seminars is minimized by virtue of holding them on a regional basis.
- Participation in the Annual Health and Safety Conference and service as a member of the Board of Directors provides an opportunity for personal and professional growth.
- Participation in our webinars and training seminars.
- The annual Conference provides a great face-to-face networking opportunity.
- The Quarterly Report provides a way of bench-marking your own performance with others in similar operations.
- The Awards program provides a prestigious form of recognition to outstanding short-term and long-term safety performance by operating categories.
- The annual conference provides a fine external motivational boost to hourly Safety Committee members as recognition for their active participation in your comparable safety program.
- The cost of membership is the lowest of any association to our knowledge.
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trendspotting | SAFETY

Domtar's Safety Journey

Over its 170-year history, Domtar has seen a tremendous amount of growth and change. Today's Domtar is unified, in part, by an unrelenting focus on safety. It's been an interesting and fruitful journey.

LARRY WARREN and JAN BOTTIGLIERI



Domtar's mill in Kingsport, TN, one of the fine paper assets "the new Domtar" acquired in 2007 from Weyerhaeuser. The Kingsport mill was awarded the 2017 Tennessee Occupational Safety and Health Administration Governor's Award of Excellence for Workplace Safety, after reaching 1 million hours without a recordable incident. *Photo courtesy of Domtar.*

A dozen years ago, Domtar was already a leading pulp and paper manufacturer with a history stretching back more than a century—not the type of company typically associated with massive organizational change. Yet in 2007, that's exactly what happened when Domtar Inc. more than doubled its assets by acquiring the Fine Paper business of Weyerhaeuser Company.

Today, Domtar employs 10,000 people, is the largest integrated manufacturer and marketer of uncoated freesheet paper in North America, and is one of the largest manufacturers of pulp in the world. Domtar's

13 pulp and paper mills and 10 paper converting facilities total 3 million tpy of papermaking capacity and 1.8 million air-dried metric tons (ADMT) of market pulp capacity annually.

Along with that tremendous change came tremendous opportunity. "It certainly was a unification of two different styles," says Marty Barfield, pulp production manager at Domtar's Plymouth, NC, mill. "Domtar was already made of several other companies; we really had a blending of different cultures into what we called 'the new Domtar.' It was a learning process to see the different ways people did safety, quality, or

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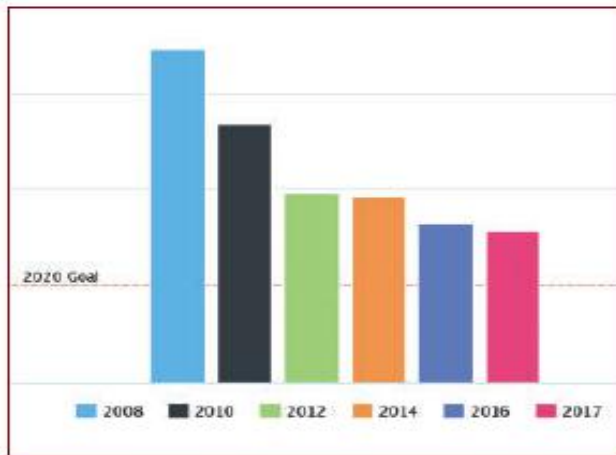


As part of its journey toward safety improvement, Domtar implemented HPI, which stands for Human Performance Improvement. As more organizations express interest in the program's potential, The Pulp and Paper Safety Association (PPSA) is working to help foster successful implementation of HPI in our industry.

On Tuesday, February 19 at 2:00 p.m. EST, the PPSA will host a webinar featuring consultant Shane Bush, a long-time trainer in the field of HPI. During the webinar, Bush will share his knowledge of what conditions must exist in order for HPI to take root and grow within an organization, and will identify the primary reasons for failure.

Also, PPSA is planning a workshop focused on how to implement HPI. Once you know what it takes to start and the things to avoid, how can you ensure a successful implementation? This workshop is tentatively planned for June 26-27 in conjunction with the annual PPSA conference on June 23-26, in San Antonio, TX.

To register for the webinar, or to learn more about the HPI workshop and the PPSA 2019 Conference, visit www.ppsa.org.



Since 2007, Domtar has reduced recordable workplace injuries by 66 percent, and has a company-wide goal of a 0.5 recordable incident frequency rate by 2020. Image courtesy of Domtar.

a number of other functions. For me, it was like starting with a blank canvas—we could craft how we wanted our safety process to be, using our collective experiences.”

STARTING WITH SYSTEMS

The organization seized that opportunity to begin a safety journey that continues today. They began by developing an audit protocol that has been improved over the years into its current form, Barfield says. The goal: to create a culture of cooperation between Domtar’s safety professionals. “We started by establishing a monthly working safety call to bring everyone together,” he says. “We would work through important issues that needed to be shared from a corporate perspective, as well as providing a stage for mills to share their experiences so others could learn.”

These foundational days were important in that they established the implementation of progressive systems that resulted in a safer work culture, Barfield notes. “We needed to develop a leadership component, which meant focusing on the history of injuries and incidents from our different companies, and from that perspective put in place programs and systems to address the issues that were causing incidents.”

The strategy produced rapid results. “When the companies came together, our recordable incident rate was slightly over two. Today, our incident rate is .75,” says Barfield. “We were able to cut it in half pretty quick; we went from 2.14 to the 1.4 range within the first four years. But you know, as you improve, it gets harder.”

After the initial slate of systems was put in place, Domtar leaders knew they needed to maintain that momentum. “The Weyerhaeuser/Domtar deal benefitted significantly from senior leadership within the new organization that was very focused on safety, with high expectations for safety performance and the way safety is viewed in the organization,” says Larry Warren, senior director of Health and Safety for the Pulp and Paper Division.

Barfield concurs. “I personally don’t think you attain the results we’ve attained without the significant, actionable commitment of leadership. That means being visible, being a flag-bearer, driving those systems approaches. That leadership, combined with the focus, effort, and dedication of all Domtar employees, has resulted in the positive impacts on our organization.”

When Domtar was ready for the next step, its safety leaders began to look at Human Performance Improvement (HPI) and error precursors. “That’s been the systemic approach that has helped us move to the next level,” Barfield says.

MAKING HPI WORK

Around 2013, several Domtar professionals attended a Pulp and Paper Safety Association (PPSA) conference in Williamsburg, VA, Warren recalls. “We heard safety consultant Shane Bush talk about HPI, and we felt Domtar was ready to undertake the initiative. Allan Bohn, senior director of health and safety for Domtar at that point in time, brought it back and presented it to the organization.”

HPI is based on work cataloged by the US Department of Energy. Much of this material was drawn from the work in the nuclear power generation industry in an attempt to reduce the likelihood of an unplanned event and the potential for a catastrophic result. The DOE makes HPI manuals available on-line, free of charge.

Still, Domtar’s safety professionals felt that attempting to undertake this effort without the support of a subject matter professional would not give them the results they wanted. “The learning curve would be too long



Workers at Domtar's Windsor, QC, mill. In 2016, Windsor was one of three Domtar mills (along with the mills in Ashdown, AR, and Hawesville, KY) to log 1 million working hours without reporting a recordable incident. It was the second time in three years that the Windsor mill reached that milestone. Photo courtesy of Domtar.

to get to the point of beginning to make a positive impact on the organization," Warren says. They worked with Shane Bush to get things started.

HPI involves three major areas: philosophy, investigation, and error reduction tools. "Early on in our journey, the investigation tool was often mistakenly thought of as the most important portion; however, our evolution has indicated that understanding and applying the philosophy is probably the most impactful part," Warren says. "That understanding partially came through training and partially flowed out of the results of investigations."

At a very high level, the philosophy of HPI involves the following ideas:

- All humans are fallible and even the best make mistakes
- It's not about "fixing" the worker
- Errors—something you did not intend to do—are predictable, preventable, and manageable
- Individual performance is influenced by organizational processes and values

- It is possible to reduce future error occurrences and minimize the impact of those that occur
- A just culture—how employees are treated, responding appropriately to errors, and becoming a learning organization—is critical.

The investigation process builds on HPI philosophy. If an error is something a worker did not intend to do, what was the context that resulted in his or her decision to act in that way at that point in time?

Part of the investigation process deals with determining the error precursors that were present that may have led to the decision that resulted in the unwanted outcome. A key part of the investigation process focuses on determining the gap between work as imagined—what leaders thought or expected to be going on—and work as actually performed, or what actually happened. The decisions around the event are analyzed through what is called "a Just Culture Decision Tree."

The process forces leadership to take a hard look at the expectations they place on staff, Warren says. "There are numerous ways to fail with

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Since opening in 1968, Domtar's Ashdown mill in Ashdown, AR, has grown to become one of the largest paper and fluff pulp facilities in the world. Its two paper machines produce 265,000 tpy and its three fiber lines have annual production capacity of 707,000 ADMT. Photo courtesy of Domtar.

TAPPISAFE Works at Domtar Ashdown

Terry Hughes, the safety manager at Domtar's Kingsport, TN, mill, brings almost two decades of experience from the fire and safety services to his current position. Hughes says that safety issues in a mill environment are not much different from public fire and safety—all present a 24/7 situation, with no chance to relax your vigilance.

Previously, Hughes served as safety manager at Domtar's Ashdown, AR mill, the company's largest mill facility. With nearly 1,000 employees and an annual production capacity of close to three-quarters of a million tons of paper, Domtar people sometimes say, "If it can work at Ashdown, it can work elsewhere."

As Domtar advanced on its safety journey, Ashdown mill management felt that its old training methods were not achieving the necessary success levels. "Specifically, we talked about our contractor management," says Hughes. "A large percentage of serious injuries and fatalities in our industry occur with contractors. So we looked hard at how we managed our contractors, and what other industry organizations were doing."



THE SOLUTION

In 2013, Hughes learned about the new TAPPISAFE Safety Orientation Program. "I liked it from the standpoint that it catered to the pulp and paper industry, the folks were easy to get along with, and they looked at some of the existing processes that we had, so we didn't need to start from scratch," he says.

Instead of one contractor team member taking the orientation and passing on information to the other team members, TAPPISAFE allows all contractor team members to take the TAPPISAFE Basic and Site Specific Orientation modules online and receive individual certification. The mill had the program in place about a year before a huge project put TAPPISAFE to the test.

"In early 2015, Ashdown began converting a paper machine to a fluff pulp machine, so we had over a thousand to two thousand contractors coming into our mill," says Hughes. "TAPPISAFE really saved us by ensuring that the contractors coming on board were orientated to the hazards that exist in our mill, and what we do to mitigate them."

In addition to an enhanced level of safety orientation, Domtar Ashdown challenged TAPPISAFE to develop the GateCheck Application, which can read each contractor's TAPPISAFE badge and record information. This gave Ashdown a way to audit time card reports and create a list of workers on the mill site. Ashdown was the first mill using TAPPISAFE to implement GateCheck for a capital project.

Domtar now has representation on the TAPPISAFE Advisory Board and Curriculum Committee. Along with International Paper, which also uses TAPPISAFE, Domtar is working with TAPPISAFE to standardize four additional courses: lockout/tagout, hot work, confined space, and confined space attendant.

Says Hughes, "TAPPISAFE works, and it's still in use at Ashdown today. We're now in the process of bringing it to Kingsport."

HPI, and I think the primary one is lack of leadership commitment. About 50 percent of the errors or events turn out to be organizational, so senior leadership needs to be committed to that path and willing to hear things about the organization that might not be pleasant.”

That leads to the final piece of the investigation process: the creation of effective corrective actions to truly eliminate the gap between work as imagined and work as performed, in order to reduce the likelihood of a future occurrence.

The third major portion of HPI is error reduction and prevention. Since error-likely situations are predictable and a just culture allows employees to identify situations where there are concerns regarding the potential for unwanted outcomes, tools and practices can be deployed to reduce the likelihood of undesirable results. For Domtar, this has led to efforts to proactively prevent issues rather than reactively respond to issues.

“Domtar’s experience with HPI has been the most influential portion of our growing understanding of human behavior and the impact on our overall performance and, specifically, our safety performance,” says Warren. “This growth would not have been possible had it not been for the PPSA, Shane Bush, and all the employees at Domtar who have expended much time and effort on it.”

THE ROAD GOES ON

The journey will continue, Warren says. “Most people started thinking about HPI in terms of safety, but really it’s about overall human performance. We’ve actually begun to use these tools for supply chain issues, HR issues, environmental issues—many areas other than safety, as it becomes more and more engrained into the way we do business at Domtar.”

The safety success has become part of Domtar’s core values, says Terry Hughes, safety manager at Domtar’s Kingsport, TN, mill. “The caring attitude is evident in all we do. We’re agile—we can change as we see fit and we’re not afraid of it. We’re innovative, so people on the floor come up with ideas for improvement. That engagement in safety—from the guy working on the machine up to the CEO—is always evident.”

Barfield says that, for Domtar, safety has been “a journey in continuous improvement. That’s evidenced by the reduction of our incident

rate, by the application of systems, by the addition of HPI, by our work with TAPPISAFE—it has not been a stagnant process. This journey has relied on many intelligent people who have great ideas, and have come together in a culture of understanding, learning, and application. It’s been great to see how we’ve progressed over the years.”

Larry Warren is senior director, Health and Safety, Domtar; reach him at larry.warren@domtar.com. Jan Bottiglieri is editorial director for Paper360; reach her at jbottiglieri@tappi.org.

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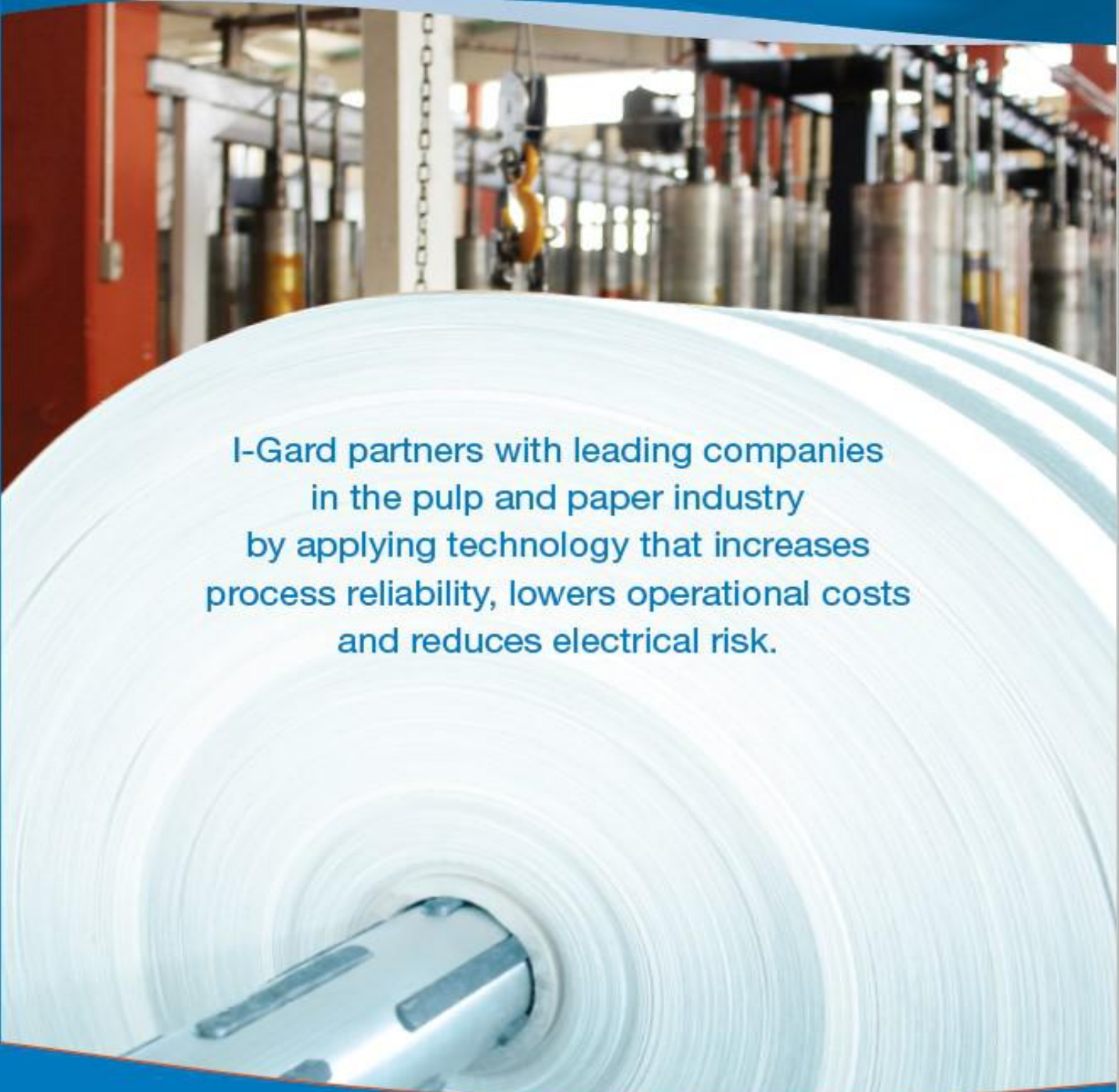
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A photograph of a pulp mill interior, showing large rolls of paper being processed by machinery. The scene is brightly lit, with various metal structures and rollers visible in the background.

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