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## A Letter From Our Chair

Steve Gearheart

Safety Director, New-Indy Containerboard



I'd like to say thank you on behalf of the Board of Directors to our members, corporate and vendor partners for your continued efforts and support of the PPSA. The PPSA Board of Directors and the association's committees have been working diligently to create valuable programming and publish articles to enhance and drive safety development at all levels of the pulp and paper industry. A few highlights from our committees this quarter are:

- The Education Committee continues to work on developing webinars based off the programming feedback at our 76th annual conference. Two webinars are planned for November with more to follow in the new year. The Education Committee and Contractor Committees are continuing to plan a contractor focused workshop for early 2020.
- The board of directors would also like to take a moment to remind the membership about its Call to Action. This publication is available on [www.ppsa.org](http://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 online [here](#).
- The Awards committee is currently evaluating the awards for the 2019-2020 awards cycle. The association is excited to continue honoring the efforts of its membership. Nomination forms will be made available this winter for the Executive Eagle Award, Innovator Award, Safety Committee/Team Award, and Safety Leader of the Year Award.
- The Conference Committee is working diligently to secure speakers and plan the strongest program to date for the 77th annual Safety and Health Conference, June 14-17, 2020 in Orlando, FL. Space on the exhibit floor is going fast with more than half the 2020 floor pre-sold. For more information regarding exhibits please contact PPSA via [email](#) or phone at 770-209-7300.

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 would like to share, please do not hesitate to contact us.

Stay Safe!  
Best Regards,  
Steve Gearheart, PPSA General Chairman



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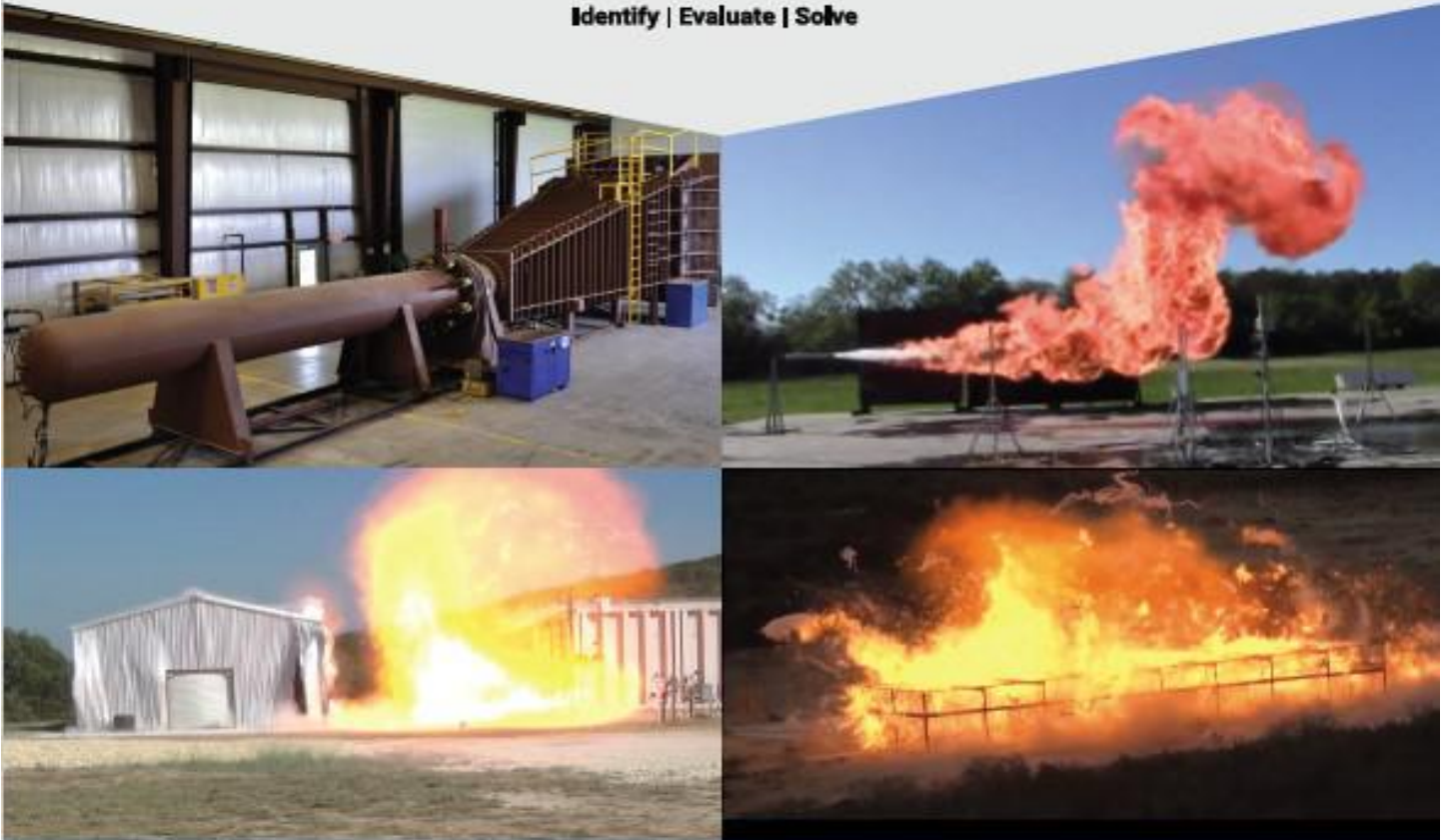
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## The Perils of the “Do-It-Yourself”

Paul Bierley

Senior Manager of Corporate Health and Safety, Domtar

Late Summer and Fall are excellent times of the year to get some work done around the house. Whether it is pruning the landscaping, cleaning the siding, or staining the deck, many of us use this time to do some project work around the house. If you get time to watch a little television during this time of the year, you will also see a variety of television shows and even entire television networks dedicated to the “DIY”er; showing you short cuts on how to save time, money, and also how to avoid having to hire the professional contractor to come to your house for the purpose of home improvement.

These DIY shows have a tendency to make it look easy, and if you watch many of these shows through the eyes of a trained safety professional, you may even see activities that would be very questionable or downright prohibited if they were being conducted at one of our facilities. Things like makeshift scaffolds, non-existent fall protection on rooftops, a variety of substandard electrical practices and a showcase of Personal Protective Equipment (PPE) violations quickly come to mind.



One of our PPSA member companies wants to share one of their relative's real life DIY experience in the hopes it will raise awareness of what can happen when the proper planning and precautions are not followed when taking on a home improvement project.

This DIY project involved applying a chemical paint /stain / varnish stripper product on his deck in order to re-paint and re-seal the deck. An example of this product is pictured with this article, but the name and brand of the actual product used that day is not important as most of these kinds of products contain very similar components. What is important to note is that this particular product contained 13% sodium hydroxide, which is significantly less than the 50% sodium hydroxide solutions that are common at many of our pulp and paper mills. The pH of this chemical is 13, which is very high on the caustic side and very capable of producing chemical burns as you can plainly see. As you can also see from

the container label, this product is concentrated and requires dilution prior to use. Fortunately, this individual did dilute the product before use at a 1:1 ratio of product to water which is appropriate for the job he was doing according to the directions on the container.

*Continued on page 8*

*Continued from page 7*

Also of note is the fact that the injured individual WAS wearing latex gloves that did protect his hands from the caustic chemical he was using. However, he was wearing a long-sleeved shirt which did soak up some of the paint stripper and contact his wrist and forearm for a prolonged period of time which resulted in the pictured burns to his wrist above where the latex glove protection ended. He didn't notice the burning until later on that day after finishing stripping the deck and by that time it was too late. He suffered some very deep and painful chemical burns and was treated later that night in the local emergency room. It was a long recovery as well because he also developed some local infections that had to be treated topically as well as with painful antibiotic injections.



This story ends well as this individual has since totally healed from his injuries and wanted to share these learnings in the hopes that it can prevent someone else from having to endure this experience. One of the biggest lessons learned is to read and heed all product warnings before the start of a job. Make sure you have all necessary PPE and recommended tools and equipment before starting the job, and if not, make sure you obtain it. Home improvement stores sell protective equipment as well as home improvement materials and products. Our companies provide PPE for use on the job so don't be afraid to ask your supervisor if you can borrow some PPE to take home with you for a home project and bring it back for use at work when you are finished using it at home. DIY projects can contain hazards similar to if not more dangerous than workplace hazards so we need to be as aware of them and protect ourselves accordingly.

The PPSA's motto is "Bringing our Employees Home Safe", but it is just as important to STAY SAFE when we are HOME!



# Contractor Committee Meeting

**The newly formed Contractor Safety Committee met at PPSA headquarters to discuss issues pertaining to the safety of our contractor community, establish goals, and develop initiatives. The committee is excited at the opportunity to build partnerships between the manufacturers, vendors and contractors. The safety of our contractors requires a collaborative effort from all of us and this committee's vision will provide valuable insight toward the PPSA reaching its goal – bringing the industry home safe.**



## Committee Goals:

- Elimination of contractor Serious Injury & Fatalities (SIFs) in the Pulp, Paper and Forest Products Industry
- Develop valuable opportunities for contractors to network, learn, share, develop, and improve
- Define contractor leading indicators and remove barriers for suppression of reporting incidents, injuries and near misses
- Foster a partnership where the Pulp, Paper, and Forest Products Industry and their supporting contractors “together” can achieve safety excellence in leadership, communication and empowering employees



To join this committee please contact PPSA Staff at [info@ppsa.org](mailto:info@ppsa.org)

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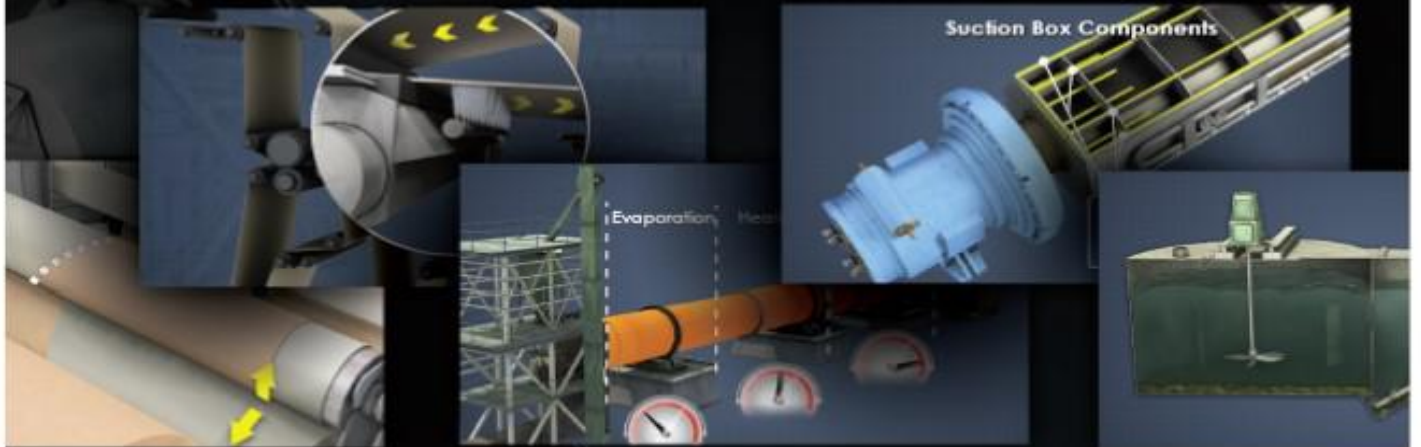
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## Human Performance

Larry Warren

Senior Director, Health and Safety, Domtar

There has been much discussion around “Human Performance” in recent years. This general body of work goes by numerous names today such as HPI, HOP, A New View of Safety, etc. While it sounds highly technical, one of the reasons why the general topic is of value is that the underlying fundamentals, regardless of which specific program is used, apply to all human behavior in any circumstance.

Human Performance tends to be thought of primarily as a work related tool but those same principles that are discussed at work are just as applicable anywhere humans are involved. The basics of human performance are apparently understood and applied by many people with no formal “training” on the subject. Because the fundamentals are so ingrained in our nature, many of those people are not aware that they are practicing “human performance improvement”. In fact, it occurred to me recently that I had been introduced to those Human Performance principles much earlier than I had previously thought. That is, even though neither I nor my father had ever heard of Human Performance some 55 years ago, he apparently was very familiar with some of the key principles of human performance. For example, one area of focus in human performance is the gap between work as imagined and work as performed.

There is much written about the normalization of deviation in all behavior. Often this is discussed as the drift away from a set expectation. In looking back now, I realize that my father and even my grandmother were practitioners! On more than one occasion, I recall being in the fields hoeing and feeling her reach over with a hoe handle and tap me to point out that I had missed some weeds and that my “work as performed” did not meet her vision of “work as imagined”. And I have to admit that on more than one occasion, my father had given me a “tune up” because of that gap.

Now I realize he was just resetting the expectation for work as performed to be sure there was an expectation in place, it was well understood, and it was enforced. I also remember that I tried to share a lot of context in some of those events. He and my mother apparently knew that context does not justify a behavior, it just helps understand it. And they did use the Just Culture decision tree and substitution test (two key HPI principles) but that often did not work out well for me and my brother. It is all much clearer to me now. I sure wish I had formally studied “Human Performance” about 50 years earlier!



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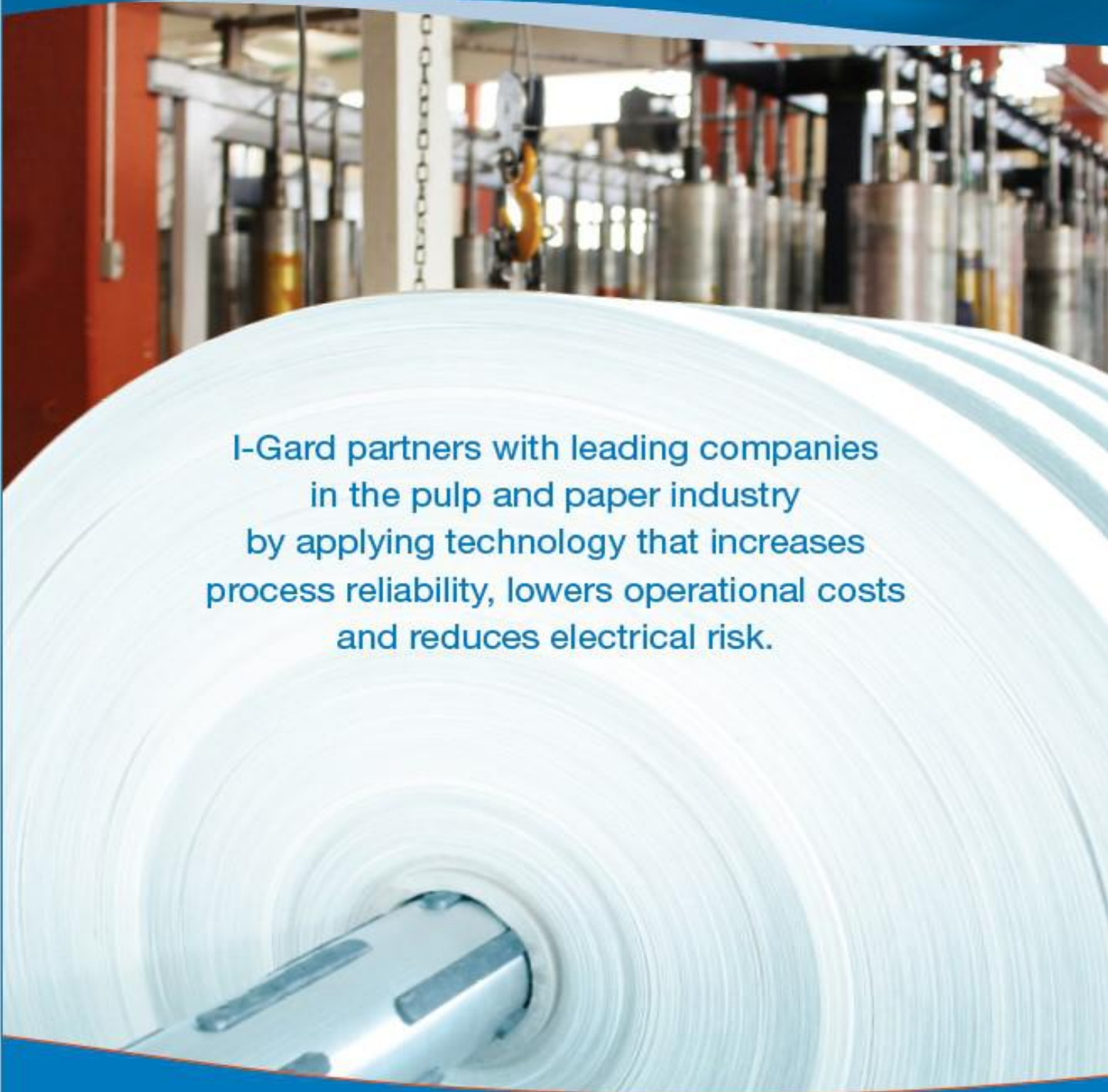
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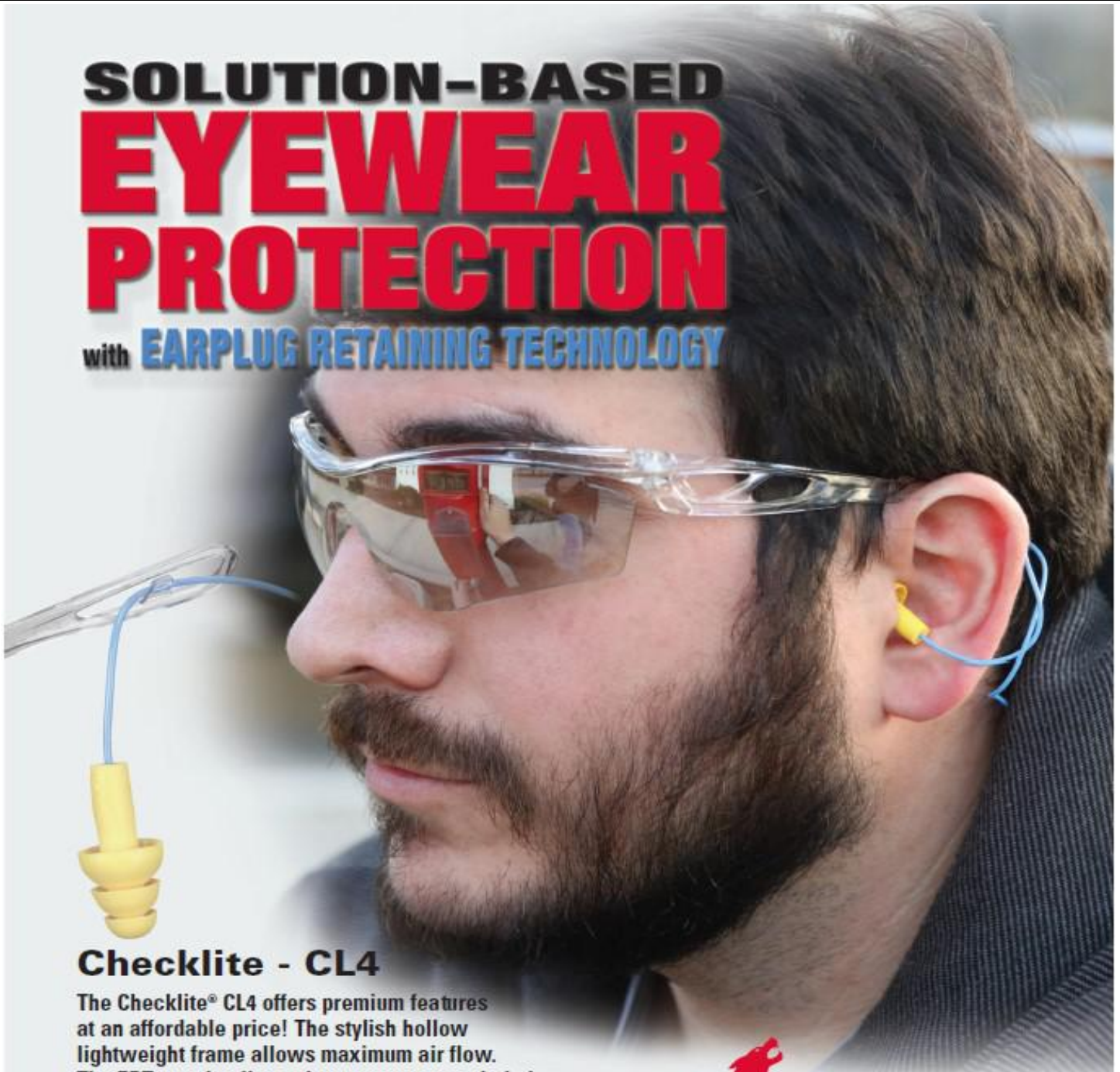
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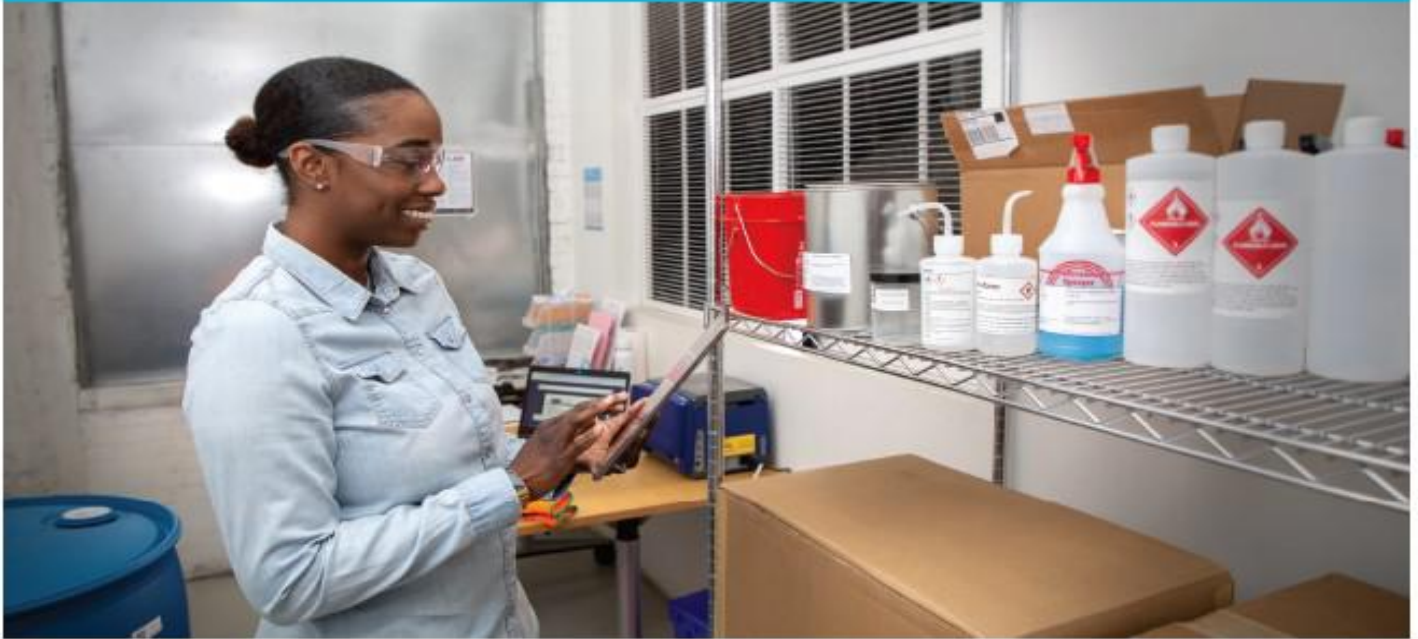
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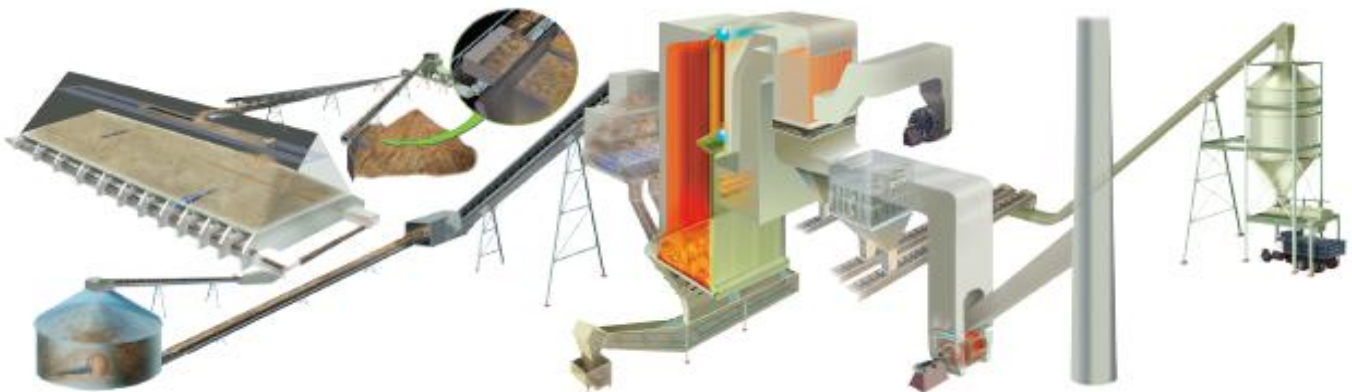


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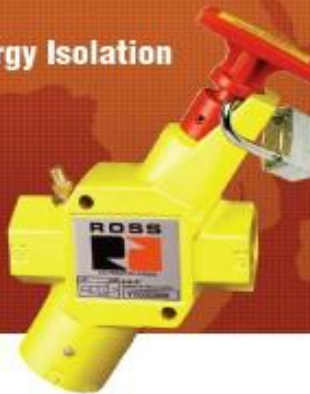
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## PPSA Committees

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 - [steve.gearheart@new-indycb.com](mailto:steve.gearheart@new-indycb.com)**

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

**Members:** Steve Gearheart, New-Indy Containerboard (Chair), Paul Bierley, Domtar, Randy Adams, Kruger, George Kolesar, Sonoco, 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 to sustain the effectiveness of the organization.

### **Conference Committee - [randy\\_adams@ktgusa.com](mailto:randy_adams@ktgusa.com)**

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

**Members:** Randy Adams, Kruger (Chair), Paul Bierley, Domtar, Tim Elizondo\*, WestRock, Steve Gearheart, New-Indy Containerboard Matthew Kanneberg, WestRock, Shawn Powell, Brady Corporation, Pete Masias, Green Bay Packaging, Dewayne Bone, Greif, 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 - [paul.bierley@domtar.com](mailto:paul.bierley@domtar.com)**

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

**Members:** Paul Bierley, Domtar (Chair), Paul Bucek\*, Green Bay Packaging, Sally Boven\*, Reflective Apparel, 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](mailto: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 46*

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**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, 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 - shawn\_powell@bradycorp.com**

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

**Members:** Shawn Powell, Brady (Chair), Steve Gearheart, New-Indy Containerboard, 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, Dean Kuhlman\*, Thompson Industrial, Bob Thomson\*, Spirit Construction, Rusty Smith\*, Austin Industrial, Clint Thacker\*, C&R Compliance, Joey Norment\*, SFC Contract Services, Cameron Pritchett\*, National Boiler, Fred Kilgroe\*, Andritz, Carolyn Moody\*, WestRock, 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 Volume 18, Issue 12

### Hurricane Preparedness and Response

Hurricanes and tropical storms can create a variety of hazards for workers. Preparing for weather-related emergencies plays a vital role in ensuring that employers and workers have the necessary equipment to stay safe when severe weather strikes. OSHA's [Hurricane Preparedness and Response](#) page provides information on creating evacuation plans and supply kits and reducing hazards for hurricane response and recovery work.



### OSHA Grantees Offer Online Training Programs on Fall Prevention

Two [Susan Harwood Training Grant Program](#) recipients have developed free training programs to help protect construction workers from fall hazards.

The [University of Tennessee](#) training program offers three modules on OSHA's role in workplace safety, health and safety standards affecting construction workers, and preventing common types of falls at construction sites. The [University of Florida](#) training program uses software to present 360-degree panoramas of construction scenarios to test trainees' skills at identifying fall hazards. The training software is available in English and Spanish.

### New OSHA Alert Focuses on Working Safely in Hot Weather

A new [OSHA Alert](#) offers information and resources to protect workers from heat-related illness when performing activities in high temperatures and humid conditions. The latest in a [series of alerts](#) addresses safety hazards and solutions that are associated with specific equipment, events, or activities.



## Legal Corner

### **So Where Does OSHA Really Stand on Safety Incentive Programs and Drug Testing?**

by Eric Hobbs

Ogletree Deakins

Many of our clients express continued confusion about what OSHA's positions on safety incentive programs and drug testing are now. So it is worth revisiting both subjects for purposes of clarity.

Those of us who were around at the time remember that, in 2016, OSHA finalized its "Improve Tracking of Workplace Injuries and Illnesses" rule, often referred to as the "electronic recordkeeping rule". Not in the body of the rule itself, but in the "preamble" to the rule – the part of rule and regulation in which the agency explains what the rule or regulation means – OSHA addressed safety incentive programs and post-incident (or "post-incident") drug testing. What OSHA said was: (1) Blanket policies requiring post-incident drug testing are unlawful because they are retaliatory against employees who are injured at work and because they discourage employees from reporting their work injuries; and (2) safety incentive programs that are based on "recordables" or other occupational injury rates are unlawful because they, too, are retaliatory against injured employees and discourage employees from reporting such injuries.

To say that OSHA's interpretation of its new rule as prohibiting most post-incident drug testing and safety incentive programs based upon recordables was met with consternation and anger by the employer community would be to understate things. And, in this author's humble opinion, the consternation and anger, at least in the case of OSHA's position on post-incident drug testing, was well placed. But industry's expression of its consternation and anger did not sway OSHA to change its position on either issue.

With the Trump Presidency in 2017, however, things began to change at OSHA (if not as dramatically as just about everyone expected). One of the changes, prompted both by the employer community's expressed concerns about the electronic recordkeeping rule and by a couple of still-pending lawsuits filed against OSHA during the Obama Administration challenging the new rule, was OSHA's proposed amendment of the rule to eliminate the requirement that employers submit their 300 Log and 301 Form data electronically every year. To the employer community's shock, however, that proposal did not even mention, never mind address, the post-incident drug testing and safety incentive program positions OSHA had taken in 2016.

In October of 2018, we found out why.

When OSHA expresses a position in the preamble to a new rule, as OSHA did in the preamble to the electronic recordkeeping rule in 2016, that position is not law; it is the agency's interpretation of the law. And interpretations can be changed by an agency almost as easily as they can be adopted in the first place. No rule making is required. So, by memorandum dated October 11, 2018, OSHA simply announced that it was reversing its position on post-incident drug testing altogether and effectively reversing its position on safety incentive programs.

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In the introduction to the memorandum, OSHA said, “The purpose of this memorandum is to clarify [OSHA’s] position that 29 C.F.R § 1904.35(b)(1)(iv) does not prohibit workplace safety incentive programs or post-incident drug testing.” OSHA also went a step further to say, “To the extent any other OSHA interpretive documents could be construed as inconsistent with the interpretive position articulated here, this memorandum supersedes them.”

Under the memorandum, OSHA took (and maintains) the following position on safety incentive programs:

- Incentive programs based on recordables or other injury rates (called “rate-based” programs) are permissible, so long as they are not implemented in a manner that discourages injury reporting.
- An employer can take negative action against an employee under a safety incentive program that is rate-based, so long as the employer also has implemented “adequate precautions” to ensure that employees feel free to report an injury or illness.
- Examples of “adequate precautions” given by OSHA include rewards to employees who identify unsafe conditions in the workplace before they result in injury, training to reinforce employees’ reporting rights and responsibilities and to emphasize the employer’s non-retaliation policy, or mechanisms (like a survey) for accurately evaluating employees’ willingness to report injuries and illnesses.

Safety incentive programs based upon recordables, therefore, lawfully may be adopted and implemented, so long as one or more of those adequate precautions, or another precaution that adequately protects employees’ rights to report their work injuries, are taken.

That said, experts in safety behavior say that safety incentive programs that are based on “lagging factors” like recordables— that is, things in the past that cannot be changed – do not incent employees to conduct themselves more safely in the future. If a safety incentive program is going to include consideration of recordables or other injury or illness rates, therefore, the employer adopting the program also should include consideration of “leading factors” that encourage safe behavior going forward. Among such factors might be an employee’s participation in safety-related training or programs above and beyond what is required; involvement in outside safety organizations reporting of near misses; making of suggestions for ways to improve safety in the plant; or other, similar things that are not merely reactive to prior injuries in the workplace or other “bad things” that have happened in the past and cannot be changed.

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With respect to post-accident drug testing, OSHA took (and maintains) the following position:

- “Most instances of workplace drug testing are permissible...”.
- Drug testing to evaluate the root cause(s) of workplace incidents that harmed or could have harmed employees is permissible.
- So long as drug testing is not used to target employees who have reported work-related injuries, the testing is lawful.

The best way for an employer to avoid OSHA’s concluding that it uses post-accident drug testing to target injured employees or those who report such injuries is for the employer to test all employees whose conduct reasonably could have contributed to an accident, not just those employees who were injured. The reality is that many accidents are caused by employees other than those who are injured as a result. The only effective way of using drug testing to get to the root of an accident’s cause, therefore, is to test all those workers who might have caused or contributed to what happened, including but not only the injured employee (if anyone was injured at all).

For more information, contact the author at (414)239-6414 or [eric.hobbs@ogletree.com](mailto:eric.hobbs@ogletree.com)

## 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 forum recognizing individuals, activities, and accomplishments that have significantly advanced the safety profession in the pulp and paper industry.
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## Letter to Distributors

**Stop Use & Recall Notice IMMEDIATE ACTION REQUIRED****3M™ DBI-SALA® Nano-Lok™ edge Twin-Leg Self Retracting Lifeline**

July 25th, 2019

Dear 3M Fall Protection Distributor:

3M Fall Protection announces an immediate stop use and product recall of the 3M™ DBI-SALA® Nano-Lok™ *edge* and Wrap Back Twin-Leg Self Retracting Lifelines. The twin-leg Nano-Lok *edge* is part of a personal fall protection system and connects two self-retracting lifelines/devices (SRL's/SRD's) directly under the dorsal d-ring of a worker's harness. It is intended to be anchored at foot-level, and is designed for sharp edge applications. The twin-leg Wrap Back Nano-Lok is intended for wrapping around an anchor and incorporates a similar energy absorber. 3M has determined that in the event of a fall and under certain conditions, the energy absorber may not properly deploy which could expose the worker to serious injury or death. Although there have been no reports of accidents or injuries associated with this issue, these products must be removed from service immediately.

To address this situation in the interests of worker safety, 3M is launching a global stop use of the Nano-Lok *edge* and Wrap Back Twin-Leg SRL units and is recalling all these units to be repaired or replaced as soon as a solution is identified, tested and certified. In the interim, and until a repair or replacement is available, end-users may elect to receive cash for their returned units as described below. This stop use and recall affects all versions of the Nano-Lok *edge* and Wrap Back Twin-Leg SRL's since first introduced in 2013.

Upon receipt of this Notice, please contact our Customer Service department at 1-833-638-2697 or email us at [3musfpserviceaction@mmm.com](mailto:3musfpserviceaction@mmm.com) to obtain a listing of all Nano-Lok *edge* and Wrap Back Twin-Leg SRL's sold to you. If you have any of these units in stock, please return them to 3M Fall Protection for credit at 3M's expense. If you have any of these units in stock, please return them to 3M Fall Protection for credit at 3M's expense.

Please immediately forward this Notice to any of your customers/users who have purchased Nano-Lok *edge* and Wrap Back Twin-Leg SRL's from you with an urgent request that they read and comply with this Notice. Alternatively, if you provide us with a list of customers who have purchased the units from you, 3M Fall Protection will communicate directly with your customers.

Thank you in advance for your support and cooperation in reaching your customers with this information.

Please email any questions to: [3MUSFPServiceAction@mmm.com](mailto:3MUSFPServiceAction@mmm.com)

Frank Courtemanche, Global Quality Manager

## **Safety: A Call to Action**

**Graeme Rodden, RISI**

During the recent Pulp & Paper Safety Association (PPSA) meeting in San Antonio, TX, a Call to Action Panel discussed the possibility of what could be seen as a sea change in the safety arena: to stop using the recordable incident rate as the be all and end all of how to judge safety performance.

The panel was chaired by Joy Ausman, Clearwater Paper; Matthew Kanneberg, WestRock; and Paul Bierley, Domtar; but it must be said they were speaking for the entire board of directors of the PPSA, which has been discussing this issue for more than a year.

Low recordables do not signify a good or bad mill. The industry needs to learn to move beyond TRIR. It may not be a true indicator of the mill of 2019 compared to the mill of 1955. It is still required by law, so mills will continue to collect the data, but as the panel members pointed out, the difference will be in how the industry uses this data.

What follows is an excerpt PPSA's Call to Action text.\*\*

For many decades the 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.

*Continued on page 57*



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One of the most disillusioning statistics 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 and 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 its 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.

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 three 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."

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.

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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.**

- 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, 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.

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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.

## THE PANEL WRAPS UP

In conclusion, the panelists said that performance should not be measured by failure, Start looking at capacity and system strengths. Allow employees to fail safely. Encourage a reporting culture. Safety is not the absence of injuries; it is the presence of defenses.

*\*\* The complete PPSA Call to Action includes detailed scenarios illustrating the points established here, comments from safety professionals, and summaries of critical talking points. Ahead of the Curve readers who would like to read the entire text may access it [at the PPSA website](#) or in the latest issue of Tissue360° magazine at <https://tissue360.tappi.org>*

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