



# **Injury and Illness Prevention Plan**

Version 1.1  
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## Policy

It is the policy of BioLabs to have a safe and healthy work environment for all BioLabs employees and member company employees (“workers”). To prevent accidents and injuries in the workplace, BioLabs has developed and implemented this Injury and Illness Prevention Program. This program applies to all workers working at all BioLabs facilities.

Senior staff and all supervisory workers are expected to do everything in their power to assure a safe and healthful working environment and to be in compliance with all federal, state, county and local safety, health and environmental regulations.

This Injury and Illness Prevention Program is applicable to all BioLabs workers. Workers are expected to follow safety rules, established safe work practices and to exercise caution in all their work activities. If any unsafe conditions arise, workers are to immediately report the condition to their supervisor or the Safety Officer for correction. Workers at all levels are responsible for working in a safe manner, and for correcting unsafe conditions.

## Responsibilities

This Injury and Illness Prevention Program (“IIPP”) was developed to comply with Federal OSHA’s General Industry Safety Order: “Injury & Illness Prevention Program” CCR Title 8, Section 3203 and Cal/OSHA's Title 8 of the California Code of Regulations (T8CCR) section 3203.

The main goal of this program is to prevent accidents, injuries and illnesses in the workplace. All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in all facilities and in electronic form.

BioLabs IIPP encourages workers to communicate with all levels of management on safety and health matters. The program also provides ways for BioLabs management to keep workers informed about health and safety issues that may impact their health and safety.

This IIPP is administered by BioLabs IIPP Coordinator (currently the Safety Officer), who has the authority and responsibility for implementing the provisions of this program for BioLabs.

### Director of Operations or Lab Manager

The Director of Operations, Lab Manager, or designee has the overall responsibility for the safety and health of workers. Responsibilities include:

- Allocation of resources necessary to provide a safe and healthy working environment.
- Providing leadership by active participation and through a demonstrated interest in the environmental, health and safety program.
- Approving health and safety policies, procedures, incentives, and disciplinary actions to ensure worker compliance.
- Establishment of workplace objectives for accident and illness prevention.

## BioLabs Staff

All members of BioLabs staff are responsible for the safety and health in the workplace. In addition, each member is responsible for the following:

- Providing leadership by active participation and through a demonstrated interest in the environmental, health and safety program.
- Implementing approved health and safety policies and procedures.

## IIPP Coordinator

The ultimate responsibility for providing a safe, healthful, and environmentally responsible workplace rests with BioLabs. The IIPP Coordinator recognizes this responsibility and is committed to requisitioning the resources necessary to achieve this goal. The IIPP Coordinator's responsibilities include:

- Bringing in additional resources (i.e., contractors, consultants, auditors, etc.) to assist in achieving BioLabs EH&S goals and objectives.
- Developing and implementing health and safety programs for BioLabs operations.
- Developing and distributing procedures for inspection, accident reporting, accident investigations, and emergency preparedness and response.
- Coordinating periodic work area inspections and implementing corrective action plans.
- Ensuring that issues identified in the area inspections have been corrected in a timely manner.
- Maintaining copies of EH&S-related documentation.
- Managing emergency evacuation and preparedness activities.
- Maintaining all individual worker safety training records.
- Assisting member supervisors with investigating and documenting all accidents under their area of supervision.
- Documenting all recordable or reportable accidents and accident statistics on the OSHA 300 Log for and ensuring an accident investigation is completed.
- Create an annual summary of injuries and illnesses recorded on the OSHA Form 300 using the OSHA Form 300A - Annual Summary of Work-related Injuries and Illnesses.
- Post the annual summary no later than February 1 of the year following the year covered by the records and keep the posting in place until April 30.

## Member Supervisors

Member supervisors have the best understanding of the hazards associated with operations they oversee. For this reason, the IIPP places the following responsibilities at this level:

- Ensuring that every worker is trained on the specific hazards associated with his/her work area and that training is documented.
- Ensuring that workers are not assigned tasks without having received adequate safety training prior to performing work.
- Ensuring that all workers are aware of, and familiar with, emergency procedures.
- Reinforcing training by monitoring the activities of workers for unsafe acts and implementing corrective action as necessary.
- Evaluating workers on the fulfillment of their EH&S responsibilities .
- Working with the IIPP Coordinator and workers to ensure every worker complies with occupational safety and health standards applicable to their own actions and conduct.
- Promptly addressing any safety concerns/issues that arise.
- Purchasing equipment and materials with environmental, health and safety in mind.
- Ensuring that area housekeeping practices are maintained.

- Investigating all accidents/incidents within his/her department/area and submitting an Accident Investigation Report to the IIPP Coordinator within 24 hours of the accident/incident.
- Providing general safety requirements to new workers.

### Member Employees

Member employees are responsible for the safety of their own actions and for monitoring the safety of operations around them. The following are specific responsibilities of employees with respect to health and safety:

- Promptly reporting any accidents, unsafe conditions, or unsafe acts to their Supervisor/Manager and the IIPP Coordinator.
- Being actively involved, as needed, in any accident investigations.
- Proactively performing periodic reviews of their job hazard analysis to ensure that it remains current and continues to help reduce workplace accidents and injuries.
- Proactive identification of hazards and suggesting solutions to improve the safety of the process, equipment, or the building.
- Obtaining information about EH&S procedures from their supervisor.
- Attending all health and safety training classes that are required.
- Participation in program audits and reviews, as required.
- Being familiar with emergency & evacuation procedures.
- Complying with occupational safety and health standards applicable to their own actions and conduct.
- Knowing the location of safety and emergency equipment and how to operate it.
- Maintaining their personal work areas in accordance with housekeeping guidelines.

### Contractors

Contractors are responsible for the safety of their own actions, utilizing their own personal protective equipment and for complying with this IIPP.

## **Compliance**

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all workers. Member supervisors and member lead personnel are expected to enforce the rules fairly and uniformly.

All workers are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment.

The following is the system of ensuring that workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of this IIPP.
- Evaluating the safety performance of all workers.
- Recognizing employees or members who perform safe and healthful work practices. This recognition is accomplished by:
  - Informal recognition of appropriate safety practices.
  - Including safety compliance within the annual performance review which is tied to salary increases and bonuses (for BioLabs employees).
- Providing training to workers whose safety performance is deficient.
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines the disciplinary process: When it becomes necessary, BioLabs reserves

- the right to discipline employees and members who knowingly violate safety rules or policies. Disciplinary measures will include, but are not limited to:
- Verbal warning (documented) such as for minor offenses.
  - Written warning for more severe or repeated violations.
  - Suspension without pay for BioLabs employees, if verbal and written warnings do not prove to be sufficient.
  - Termination of employment for BioLabs employees or termination of membership for members.
- Other means that BioLabs uses to ensure worker compliance with safe and healthful work practices include:
    - Management being responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all workers.
    - Managers being expected to enforce the rules fairly and uniformly.
    - All workers being responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.
  - BioLabs system of ensuring that all workers comply with the rules and maintain a safe work environment include:
    - Informing workers of the provisions of this IIPP.
    - Evaluating the safety performance of all workers.
    - Recognizing workers who perform safe and healthful work practices.
    - Providing training to workers whose safety performance is deficient.
    - Disciplining workers for failure to comply with safe and healthful work practices.
    - Terminating any BioLabs employee or revoking any member employee's membership who continues to violate safety rules and policies after receiving written warnings.

## Communication

### Introduction

It is BioLabs policy that there is open, two-way communication between management and Biolabs employees and member companies, especially with respect to environmental, health and safety (EH&S) issues. No procedures or work practices should be implemented that impede this communication process. The following represents a model of this communication process.

The BioLabs IIPP is designed to allow and encourage workers to communicate with management on EH&S issues and to provide the necessary mechanism for management to keep workers informed regarding matters important to their health and safety. Workers have been advised that there will be no reprisals or other discrimination for expressing any concern, comment, suggestion, or good faith complaint about a safety-related matter.

Furthermore, workers are informed of their other rights and protection under the law, such as:

- Access to medical records.
- Access to Safety Data Sheets for chemical use.
- Right to refuse unsafe or hazardous work.

The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff/members in a form that is readily understandable and consists of one or more of the following items:

- New worker orientation including a discussion of safety and health policies and procedures.
- Review of BioLabs IIPP.

- Workplace safety and health training programs.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate.
- Posted or distributed safety information.
- A system for workers to inform management about workplace hazards.

### Communication Policy and Safety Rules

The IIPP Coordinator will be responsible for coordinating training on specific EH&S issues, such as those that are outlined in this IIPP. Specific policies and job procedures are to be reviewed with the new worker by his/her Supervisor/Manager.

Communication meetings are encouraged between management and workers to cover all aspects of worker safety. These meetings can either be dedicated to cover EH&S issues, or can be part of other, regularly scheduled meetings.

### Worker Compliance and Safety Concerns

BioLabs recognizes that worker contributions to the EH&S program ensure a safe and healthful work environment and often improve employee morale and productivity.

On the other hand, poor safety performance must be corrected just as poor performance measures in other areas must be addressed. Violation of EH&S policies cannot be tolerated because of the potentially severe consequences. All violations of Company safety policies must be reported to the Safety Officer.

The outcome of such violations could include:

- Personal injury or illness.
- Injury or illness inflicted upon coworkers.
- Environmental impact.
- Equipment, property, or facility damage.
- Business interruption and financial loss.

## **Identification of Workplace Hazards**

This Section describes the potential occupational health and safety hazards associated with the jobs and responsibilities of workers working at BioLabs. This information is used to identify preventative work conditions and safe work practices.

BioLabs uses the following methods for identifying, evaluating, and preventing occupational health and safety hazards:

- Periodic inspections of all work areas.
- Identification and documentation of new hazards.
- Review of historical data pertaining to accidents, injuries, and/or illnesses that have occurred at BioLabs.
- Evaluation of information provided by workers.

### Inspections

An initial inspection will be performed at the time of implementation of BioLabs IIPP.

Periodic inspections are completed by BioLabs personnel to identify unsafe conditions and work practices and procedures. If corrections are needed, controls are utilized to eliminate or control existing or potential hazards. Inspections are performed:

- At least annually by BioLabs personnel, or a qualified person, who understands the hazards associated with the business with assistance from the IIPP Coordinator, if necessary. Written inspection reports should be reviewed by management and/or the safety committee.
- As scheduled, by managers and supervisors, to ensure established safe work practices are being followed and unsafe conditions or procedures are identified and corrected.
- Routinely, by workers, as a mechanism of self-inspection of everyday safe work practices.
- Whenever new processes, procedures, or equipment are introduced that represent a new hazard. Workers should be encouraged to communicate to managers and supervisors of possible hazardous situations.
- Whenever BioLabs is made aware of a new or previously unrecognized hazard.

The reasons why any inspection items are not completed in a timely manner shall be documented thoroughly with an explanation of the delay and updates until the item is resolved. Hazards should be prioritized based on severity. Completion dates will be assigned to responsible parties and monitored by the IIPP Coordinator. A feedback system should be utilized to inform workers when the situation was corrected, or the appropriate action taken/implemented.

BioLabs intent is to immediately abate any recognized hazard which presents risk or imminent harm. If necessary while the hazard is being corrected, interim protection should be provided to workers who need or request it. If BioLabs is unable to abate the hazard without potentially endangering employees and/or property, all personnel except those necessary to correct the condition, will be removed from the area until the hazard can be abated.

### Identification and Control of New Hazards

Identifying hazards and eliminating or controlling them as early as possible will help prevent injuries and illnesses (OSHA 3071, Job Hazard Analysis, 2002 revised). A Job Hazard Analysis ("JHA") is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. A JHA is a method for systematically conducting and documenting a risk assessment associated with job hazards.

All workers should review and be familiar with any JHAs for their area.

### New Equipment and Processes Reviews

New equipment and process reviews are used by BioLabs to identify EH&S deficiencies present in equipment under consideration for purchase. By pro-actively reviewing new equipment, BioLabs can reduce the potential for personal injury and environmental impact and ensure that the facilities are suitable for the equipment prior to the equipment arriving on site. The following steps will be followed to complete the review.

New equipment reviews are conducted when a Manager/Supervisor or Department identifies to the IIPP Coordinator that new equipment is to be brought on site and must be made a part of the facility.

The IIPP Coordinator will review the facilities requirements for the new equipment and the safety features provided with the equipment. This review may include assistance from a third party for technical expertise.

## Standard Operating Procedures (SOPs)

Standard operating procedures and safe work practice instructions provide a standardized set of operating procedures which include health and safety rules and procedures. SOPs convey operational procedures, process information, safe work conditions, practices, and protective/safety equipment needed to eliminate or mitigate identified safety and health hazards.

Supervisors are responsible for incorporating safe practices into work instructions and procedures, with the assistance of the IIPP Coordinator.

## Medical Evaluation

Medical evaluation may be required when a worker develops a medical condition which may have been caused by their job. Any time that medical evaluation is required, worker name and medical records will remain confidential. The medical provider will not divulge any specific medical information about worker to BioLabs or member companies and will only give BioLabs medical information necessary to assist in the correction of confirmed or potential problems.

## **Accident Investigations and Hazard Correction**

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be performed by the Safety Officer and overseen by the Safety Committee. Accident investigation is a systematic method for collecting factual information that makes it possible to accurately reconstruct the accident and determine the underlying reason(s) for the cause of the accident. The investigation is fact-finding, not fault finding.

Once the primary causes for the accident have been determined, preventative measures can be identified and effectively instituted. Each Supervisor/Manager has a prominent role in participating in an accident investigation. The responsibility for conducting an accident investigation includes collecting the facts, determining the sequence of events that resulted in the accident, identify action to prevent recurrence, and provide follow-up to ensure that corrective action was effective.

All accidents should be investigated promptly regardless of their severity. Promptness of the investigation is essential since conditions at the accident scene may change. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes late from discussions of the accident with other workers. Promptness in checking the scene assures workers that management is highly concerned for their well-being. The type of investigation depends on the nature and magnitude of the accident.

## Accident Response and Corrective Action Process

Each supervisor shall promptly investigate, thoroughly analyze, and report in writing to the IIPP Coordinator all accidents involving personal injury and/or property damage or the potential therefore once they occur. Accident investigation reports shall be submitted within 24 hours of the first notice to the supervisor, and will include:

- Visiting the scene as soon as possible.
- Interviewing affected workers and witnesses.
- Examining the workplace for factors associated with the accident/exposure/near-accident.

- Determining the causes of the accident/exposure/near-accident.
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring.
- Recording the findings and corrective actions taken.

The IIPP Coordinator will complete an Injury and Illness Incident Report (OSHA Form 301) and Human Resources will contact the Workers' Compensation carrier within 24 hours when required. If applicable, the IIPP Coordinator will also enter the information on the OSHA 300 Log.

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered.
- When an imminent hazard exists, which cannot be immediately abated without endangering worker(s) and/or property, the IIPP Coordinator will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection and training.
- All such actions taken, and dates of completion must be documented on the appropriate forms.

The IIPP Coordinator and the Supervisor/Manager will work together to determine the cause of the accident so it can be quickly addressed or if a more detailed corrective action plan is needed. The Supervisor/Manager will be responsible for implementing the corrective action plan.

BioLabs will track all accidents using the Injury and Illness Incident Report (OSHA Form 301).

### Accommodating Medical Restrictions

Any worker returning to work after a medical absence of five (5) or more days is required to bring a Return-to-Work authorization form signed by a physician with a copy to the IIPP Coordinator.

BioLabs, in coordination with the physician, will assess the appropriateness of the worker returning to work based on the worker's health status, and will evaluate the medical restrictions based on knowledge of job requirements. The IIPP Coordinator will track absences due to work-related injury or illness on the OSHA 300 Log.

## **Training and Instruction**

### General Safety Information

BioLabs will provide training and instruction on the specific elements of this IIPP, including evacuation procedures when:

- The IIPP is first implemented.
- New workers are hired.
- Workers are given new job assignments for which training has not been previously received.
- New processes, procedures, or equipment are introduced into the workplace and represent a new hazard.
- BioLabs is made aware of a previously unrecognized hazard.

Additional training and instruction may include:

- A review of potential safety and health hazards identified in work areas.

- Necessary means of minimizing potential hazards, including safe work conditions and work practices.
- Instruction on any safety equipment or personal protective equipment or procedures which should be used .

Worker self-training and instruction may include:

- Proactive understanding of the outcome of accident (or “near-miss”) investigations to ensure the necessary action is taken to prevent occurrence / reoccurrence.
- Understanding the hazards specific to his/her job assignment (for example, review of an SDS for a new laboratory chemical). Periodic review of the JHA can assist with identifying new hazards.

### Additional Training

Certain individuals may require additional training in specific areas to perform their jobs safely. This training may be coordinated by the Supervisor/Manager or an outside vendor.

The new worker’s Supervisor/Manager is responsible for ensuring that specific job-related safety information is reviewed with the worker on his/her first day of work and documented. Training that is conducted by the Supervisor/Manager for new worker’s specific job-related safety information will be maintained in the Supervisor’s files.

As job duties or work assignments change, or as new processes, equipment, chemicals, etc. or previously unrecognized hazards are observed, additional training may be required and will be conducted on an as-needed basis.

## **Recordkeeping**

### Inspection Records

Records of periodic work area inspections and corrective action documentation are retained by the IIPP Coordinator for a period of at least three years.

### Training Records

Copies of all health and safety training records are documented and retained by the IIPP Coordinator for a period of not less than three years.

### Medical Records

Medical records are maintained for each worker with occupational exposure in accordance with 29 CFR 1910.1020, “Access to Employee Exposure and Medical Records.”

The selected urgent care clinic is responsible for maintenance of the required medical records. The worker activity status reports from both the attending physician and Insurance carrier are retained for the duration of employment plus 30 years. Upon written request, worker medical records will be provided to workers or to anyone having written consent of the worker. Such requests should be sent to the selected urgent care clinic. Subpoenas will be complied with while protecting privileged information on litigated files.

## Program Information

### Program Audit and Review

BioLabs IIPP Coordinator will conduct an annual review of the IIPP to ensure that the program reflects current company policies and practices, complements management responsibilities, and incorporates any process or facilities changes that have occurred.

## History

DATE	AMENDMENT	INITIAL
06/22/2021	Original IIPP Document	JL
02/17/2022	Updated Document for Generic Site Use	