

ANR Administrative Handbook Section 211 ENVIRONMENTAL HEALTH AND SAFETY PROGRAM	Date: 03/01/11 Supersedes: 07/20/06
RESPONSIBLE DEPARTMENT: Office of the Controller and Business Services Director	
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I. Policy on Management of Health, Safety and the Environment

Agriculture and Natural Resources (ANR) is committed to providing healthy and safe workplaces and activity locations for employees, principal investigators, students, volunteers, and visitors; and to protecting the environment through implementation, as modified for ANR circumstances, of the University's Policy on Management of Health, Safety and the Environment. This is accomplished using the principles of an Integrated Safety and Environmental Management (ISEM) System. The University Policy and ISEM System descriptions are available online at: <http://www.ucop.edu/riskmgt/bsas/documents/presidentialpol.pdf>.

II. Principles Supporting the Policy and ISEM System

A. Management Commitments

ANR endorses the concept of individual responsibility for safety and environmental stewardship. Supervisors and volunteer leaders must demonstrate commitment to the implementation and ongoing execution of processes and procedures that promote health, safety, and the environment. Employees, principal investigators, students, and

volunteers are responsible for assuring their own safety and promoting safe, healthy, and environmentally sound workplaces or locales where activities are performed.

B. Responsibilities

1. Directors, Managers, or Department Heads of ANR units have direct authority and responsibility for implementing and maintaining safety and environmental programs that comply with federal, state, and local laws, and University policy. This includes establishing a site-specific Injury and Illness Prevention Program (IIPP) for each ANR location.
2. Supervisors and volunteer leaders are responsible for protecting those they supervise or manage and adhering to the Policy. Accountability is addressed through position descriptions, performance evaluations, in contracts, and other management tools.
3. The ANR Environmental Health and Safety (EH&S) Office is responsible for assuring the policy and attendant ISEM System are understood and implemented for ANR activities. Moreover, the EH&S Office provides guidance on how to prevent injuries and illnesses and achieve and maintain compliance with regulatory requirements. It also serves as a resource for EH&S training materials and for resolving EH&S questions or concerns. ANR EH&S information is available online at: <http://safety.ucanr.org>.
4. Safety Coordinators are assigned by the Director, Manager, or Department Head at each ANR unit or location and are responsible for facilitating the flow of EH&S information and overseeing local implementation of the EH&S Program.

C. Establishment of Clear Roles and Responsibilities

As described above and included in each unit's IIPP, ANR has established clear lines of authority and responsibility to supervisory or management staff for assuring safety and environmental protection at all organizational levels.

D. Ensuring Competence Commensurate with Responsibilities

ANR supervisors shall assure that employees, principal investigators, students, and volunteers are adequately trained and/or possess the experience, knowledge, skills, and abilities to perform tasks in healthy, safe, and environmentally responsible manner. ANR EH&S provides tools to assist with identifying, tracking and conducting training, including an Employee Training Plan & Tracking Form (<http://ucanr.org/safetyforms>).

E. Balanced Priorities

ANR resources are effectively allocated as needed to address safety and environmental protection. This commitment is demonstrated by management support of the EH&S Office and the commitment of each ANR location to assign a Safety Coordinator. Protecting employees, principal investigators, students, volunteers, participants, and the environment is a priority whenever ANR activities are planned and performed. ANR participates in the University's Be Smart About Safety program (<http://www.ucop.edu/riskmgmt/bsas/>), which invests funding from the Workers' Compensation program to projects that are designed to reduce the frequency and severity of employee injuries.

F. Identification of Safety and Environmental Standards and Requirements

1. Before an ANR activity is conducted, a supervisor, volunteer leader, or designated employee must evaluate potential hazards and environmental impacts and identify the appropriate set of controls or requirements to assure employees, principal investigators, students, volunteers, activity participants, visitors, members of the public, and the environment are protected from adverse effects. The principal responsibility for evaluating hazards and environmental impacts is that of supervisors, volunteer leaders, and employees.
2. ANR EH&S staff and Safety Coordinators are available to provide assistance, consultation, and recommendations for controls or requirements and their implementation. ANR EH&S Guidelines (<http://safety.ucanr.org/Guidelines/>) provide

information to assist with assessing hazards or potential impacts and outline appropriate procedures for preventing injury or maintaining compliance with regulations. A Project Safety/Risk Management Plan (<http://ucanr.org/safetyforms>) may be used to document this process.

G. Encouraging Stakeholder Participation

The ANR EH&S Office uses websites, e-mail lists, newsletters, and other communication methods to reach stakeholders, share information, and increase involvement in safety, environmental compliance, and emergency response programs. Methods of communication about safety issues are described in each location's IIPP. Hazard Alert forms (<http://safety.ucanr.org/files/2853.pdf>) are one method that employees or other stakeholders may use to make ANR managers aware of hazards or safety concerns. Additionally, any stakeholder may report a hazard (<http://ucanr.org/hazardreport>) or pose a question (<http://ucanr.org/askehs>) to ANR EH&S.

H. Adapting Hazard and Operational Controls to Specific University Activities

1. ANR, through the EH&S Office and Safety Coordinators, uses administrative and engineering controls to prevent and mitigate hazards and environmental impacts of the activities being performed. This is intended to preempt damage by designing the activities and controls to reduce or eliminate accidents, injuries, exposure, and unplanned releases of substances into the environment.
2. ANR EH&S Guidelines (<http://safety.ucanr.org/Guidelines/>) provide information to assist with assessing hazards or potential impacts and outline appropriate procedures for preventing injury or maintaining compliance with regulations. ANR EH&S Plans, Forms, and Templates (<http://ucanr.org/safetyforms>) can be used to document controls or procedures that mitigate hazards or demonstrate compliance with regulations or policies.

I. Obtaining Authorization Prior to Conducting an Activity

1. Before an ANR activity is initiated, the supervisor or volunteer leader must assure that all protective safety and environmental requirements have been identified and addressed. The level of review will vary depending on the regulatory requirements or the level of hazard. Certain higher risk activities require formal prior authorization (e.g., entering a permit-required confined space, work with certain bio-hazardous materials).
2. When required, permits must be obtained from regulatory agencies prior to performing an activity. Some examples of activities requiring permits are work with quarantined pests, health permits for drinking water or food service, air quality permits for air emission sources, or stormwater runoff permits. Each ANR location is responsible for obtaining appropriate authorizations, following any permit or authorization requirements, keeping appropriate records, and making reports; with support and consultation from the ANR EH&S Office.

III. Core Functions Supporting the Policy and ISEM

- A. ISEM relies on five core functions that provide the necessary framework for any activity that could potentially affect employees, principal investigators, students, volunteers, visitors and the environment. These functions are applied as a continuous cycle with the degree of rigor appropriate to address the type of activity and the hazard or environmental risk involved.
- B. Supervisors, employees, or volunteer leaders shall:
 1. Define the Activity: Goals and programs are translated into activities, expectations are set, tasks are identified and prioritized, and resources are allocated.
 2. Analyze Hazards: Hazards and environmental risks associated with the activities are identified, analyzed, and categorized.
 3. Develop and Implement Controls: Applicable policies and/or regulatory requirements are identified and agreed upon, controls to prevent/mitigate hazards and risks are identified, the safety and environmental parameters are established and controls are implemented.

4. Perform Activities within Controls: Readiness is confirmed and activities are performed safely according to established procedures and in compliance with applicable regulations and policies.
5. Feedback and Continuous Improvement: Obtain feedback on the adequacy of controls and identify opportunities for improving the definition and planning of activities. Supervisors, in cooperation with Safety Coordinators, conduct independent oversight and, if necessary, participate in regulatory enforcement actions. ANR EH&S staff and Safety Coordinators are available to provide safety and environmental assessment, training, consultation, and independent oversight functions for all Core Functions.

IV. Implementation

- A. The ANR Environmental Health and Safety Program encompasses both the University Policy on Management of Health, Safety and the Environment as well as ISEM, and is communicated to employees, principal investigators, students, and volunteers through this policy and ANR EH&S Orientation Training (<http://ucanr.org/safetyorientation>). Expectations are expressed verbally and in documents such as the Injury and Illness Prevention Program available at each ANR location and may vary from activity to activity, based on the hazards and operations being performed. Components of the ISEM System establish objectives and concurrent tracking of performance with respect to achieving and maintaining compliance with health, safety and environmental requirements.
- B. The ANR EH&S Office and Safety Coordinators use metrics to assess continuous improvement in regulated and non-regulated incidents, illness, injury, and pollution prevention efforts at all levels of the organization.
- C. The ANR EH&S Office conducts on-site reviews of ANR locations to assess implementation of safety programs and identify potential hazards or areas of non-compliance. After each review, a report is submitted to the unit's Director or Manager and Safety Coordinator, listing potential safety or environmental compliance issues, citation of applicable regulations or policies, and suggestions for corrective action. The Director or Manager provides a report back to EH&S documenting that the issues have been corrected.

ADDITIONAL RESOURCES:

- EH&S Website: <http://safety.ucanr.org>
- Safety Coordinator Resources: http://safety.ucanr.org/Safety_Coordinator/
- EH&S Guidelines: <http://safety.ucanr.org/Guidelines/>
- EH&S Plans, Forms, & Templates: <http://ucanr.org/safetyforms>
- EH&S Training Resources: <http://ucanr.org/safetytraining>
- EH&S Safety Notes: <http://ucanr.org/safetynotes>
- 4-H Resources: <http://ucanr.org/4Hsafety>
- Master Gardener Resources: <http://ucanr.org/MGsafety>