

ENVIRONMENTAL PROTECTION POLICY STATEMENT

Metric recognizes environmental protection as one of our guiding principles and a key component of sound business performance. It is important that we all work to the same safety standards, and that we help each other achieve and maintain these standards by planning safety considerations in all our work activities. We will operate in compliance with all relevant federal, provincial, and municipal environmental legislations and we will strive to use pollution prevention and environmental best practices in all we do.

Metric believes that the following points must be accepted and followed:

- Identify, assess, and responsibly manage its environmental health & safety risks through comprehensive risk management plan,
- Integrate the consideration of environmental concerns and impacts in all our decision making and activities,
- Promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner,
- Train, educate and inform our employees about environmental issues that may affect their work,
- Where required by legislation or significant health, safety, or environmental hazards exist, develop, and maintain appropriate emergency and spill response programs and
- Strive to continually improve its environmental performance by frequently reviewing and updating its environmental policy in the light of current and planned work.

Our responsibility to the environment takes on many forms including:

- Erosion and Sediment Control
- Keeping contaminants, debris, and silt out of our waterways and sewer systems
- Restoring natural contours of banks and shorelines upon completion of work,
- Complying with the Fisheries Act and Species at Risk Act (SARA)
- Preventing mud, dirt, and rocks from being taken off jobsites and deposited onto roadways
- Minimizing dust and debris from being blown off jobsites
- Tree Protection
- Treat all native trees as an asset to our environment
- Reduce the likelihood of any damage to a tree's branches, trunk, leaves, or root system
- Release or Spill of Contaminants
- Take all precautions to prevent pollutants from being released into the environment
- Report any incident of a release or spill of toxic or potentially harmful materials


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January 06, 2025

Date

Document No.: HSE-HBK-0007 Rev 03		Document Name: Environmental Policy and Program	
Effective Date: January 06, 2025	Department: Safety Department	Approved By: Franco Vaiano	

ENVIRONMENTAL PROTECTION PROGRAM

PURPOSE

In recognizing the importance of our environment, we are committed to ensuring the protection and preservation of the environment and promoting sustainable development. The implementation of an Environmental Protection Program ensures efficiency, effectiveness, and compliance with environmental legislation. We will strive towards pollution prevention and environmental best practices in planning and executing all projects.

Process Controls

- Pre-construction meeting to communicate project environmental protection goal and expectations.
 - Aspect of the scope of work that represent a reasonable potential for adverse environmental impacts.
 - Hazardous materials, reviewing MSDS's and designating storage area and appropriate controls.
 - Adjacent land uses would be especially impacted from storm water runoff, receiving water and storm and sewer drainage channels.
 - Identify potential spills and release and ensure adequate and appropriate clean up supplies and equipment are available on or near the project.
- Preparatory Phase: In advance of the work, we conduct preparatory phase planning which includes inspecting the jobsite before work begins and conducting a meeting to review details, specifications, expectations, and items for heightened awareness.
- Initial Phase: When work is ready to start, we conduct an initial phase environmental inspection that ensures that the necessary site conditions, materials, equipment, and personnel are in place and ready for work to begin. When work begins, we verify that the initial work meets specifications.
- Follow-up Phase: As work proceeds, we perform follow-up environmental inspections to ensure that work proceeds according to specifications until the work task is complete.
- Enforce environmental protection policies that monitor work conditions before and during work so that environmental protection results are assured.
- Post-Construction: When construction activities are completed, efforts are directed to restore the disturbed areas and reestablish vegetation. We continue to monitor the recovery of the project area until site conditions have met the levels like pre-construction conditions.

Project-Specific Environmental Protection

- Metric defines environmental protection will implement proper planning and preventative measures to minimize the likelihood of spills, and to clean up a spill quickly and successfully should one occur (see below section on Immediate Response Procedures and Immediate Responsibilities).

Environmental Evaluations

- Metric will frequently evaluate all company procedures and processes as part of our commitment to constantly minimize our environmental impact.
- Evaluations will include reports on waste management, spill prevention and control, sediment and erosion management, hazard analysis management and employee awareness.

Spill Prevention

- Metric will implement proper planning and preventative measures to minimize the likelihood of spills, and to clean up a spill quickly and successfully should one occur (see below section on Immediate Response Procedures and Immediate Responsibilities).

Program Applicability

- The EPP applies to any person, subcontractor, or organization involved with the project. The project team consists of all parties engaged by Metric to execute the project work for the design, construction, operation, and maintenance of the project.

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WORKING NEAR LAKES AND RIVERS

TIMING

- Metric will schedule work:
 - During periods of low flow, while also respecting the timing windows of fish, when work in water is required.
 - To avoid wet, windy, and rainy periods that may increase erosion and sedimentation.

EROSION AND SEDIMENT CONTROL

- Metric will implement an Erosion and Sediment Control Plan for each project site which will include:
 - Installing erosion and sediment control measures before work is started, and frequently inspecting and maintaining/repairing these controls throughout the entirety of the project.
 - Filtering any sediment out of water flowing onto the site and water being pumped or diverted away from the site
 - Setting up and maintaining appropriate barriers for silt, suspended sediment and debris when performing in- water work.
 - Measures for containing and stabilizing waste material
 - Removing erosion and sediment control materials once the project site is stabilized.

OPERATION OF MACHINERY

- Metric will ensure that machinery arrives on each jobsite in a clean condition and maintained free of leaks, invasive species, and noxious weeds.
- Metric will wash, refuel and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water.
- Metric will minimize machinery fording of the watercourse, and when frequent fording is unavoidable, temporary crossing structures will be used.

SHORELINE/BANK RE-VEGETATION AND STABILIZATION

- Metric will minimize riparian vegetation clearing and will prune or top vegetation instead of uprooting/grubbing whenever possible. Metric will not remove riparian vegetation if the riparian area is identified as part of the critical habitat of an aquatic species at risk.
- Metric will minimize the removal of natural woody debris, rocks, sand or other materials from the banks, shoreline, or bed of the waterbody below the ordinary high-water mark; if material must be removed from the waterbody, Metric will set it aside and return it to the original location once work is completed.
- Metric will restore bed and banks of the waterbody to their original contour and gradient, and when possible, Metric will stabilize shoreline or banks to prevent erosion or sedimentation through re-vegetation with native species suitable for the site.
- Whenever using rock to stabilize eroding or exposed areas, Metric will ensure that appropriately sized, clean rock is used; and that rock is installed at a similar slope to maintain a uniform bank/shoreline and natural stream/shoreline alignment.
- Metric will remove all construction materials from each site upon project completion.

FISH PROTECTION

- Metric will be aware of situations where passage and sufficient water for fish may become restricted and will follow the advice of Fisheries and Oceans Canada in such circumstances.
- Metric will comply with the Fisheries Act and Species at Risk Act (SARA) by:
 - Avoiding causing serious harm to fish unless authorized by the Minister of Fisheries and Oceans Canada
 - Not depositing deleterious substances into waters frequented by fish.
 - Not killing or harming any individual belonging to a species listed as extirpated, endangered, or threatened, and not damaging or destroying any habitat or structure belonging to any such species.
- Metric will retain a qualified environmental professional to ensure any appropriate protocols are applied, and applicable permits for relocating fish are obtained and to capture any fish trapped within an isolated/enclosed area at the work site and safely relocate them to an appropriate location in the same waters.
- Metric will screen any water intakes or outlet pipes to prevent entrainment or impingement of fish.

HAZARDOUS MATERIALS

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STORAGE

Metric shall follow proper hazardous materials storage practices, including, but not limited to the following:

- Proper signage at and or adjacent to storage areas.
- Storage of fuel and other flammable or otherwise hazardous material shall be in accordance with specific information provided on the product MSDS, client requirements workplace-specific and applicable regulations.
- Storage areas for fuel containers or other hazardous material shall be situated in a location that is not susceptible to accidental damage as a result of construction operations.
- Adequate Fire Extinguishers will be in close proximity to material storage locations.
- A bulk storage for Hazardous liquids will be contained in tanks with double wall protection or have secondary containment adequate to hold the volume of product being stored (storage tanks and containers must conform to all applicable industry codes).
- A minimum of two (2) 30-pound or four (4) 20-pound fire extinguishers must be located and readily available at all fuel storage locations. The extinguishers shall be located not less than 25 feet and not more than 75 feet from these locations.
- Tools and materials to stop the flow of leaking tanks and pipes shall be kept on-site (spill kits (or necessary material) must be located at fuel storage areas.
- Fuels, lubricants, waste oil, and any other regulated substances shall be stored in aboveground tanks only.
- Vehicle maintenance wastes, including used oils and other fluids, shall be handled, and managed by personnel trained in the procedures outlined in this plan. Vehicle maintenance waste will be stored and disposed of in accordance with regulations.

HANDLING

Any workers handling or working with Hazardous Materials will be:

- Trained in WHMIS.
- Must review the MSDS for the product they are working with.
- Aware of the potential health effects from overexposure.
- Instructed on the PPE required when working with hazardous products.
- Instructed in the controls necessary for the safe use of the hazardous product.
- Instructed in Immediate Response Procedures and Responsibilities in the event of an uncontrolled release or spill.
- Instructed in proper storage and disposal methods.

DISPOSAL

Disposal of Hazardous Materials/Waste is regulated by the applicable environmental authorities in the jurisdiction in which the work is performed. Project management is responsible to ensure that all legislative requirements for the disposal of hazardous materials/waste are identified and followed including transportation.

SPILL CONTINGENCY

Where the contract involves the supply and/or handling of fuel, oil, chemicals or other hazardous materials, the workplace/project site supervision team shall ensure that an emergency cleanup plan is in place in event of a spill. Spill contingency plan shall be prepared to cover the particulars of that project and shall include, but not limited to the following;

- Determine hazardous materials on site and review of the MSDS sheets (Hazardous Products Form)
- Methods of containment, including necessary materials, equipment, and personnel.
- Identify person or persons in charge of operation, formalization and posting step-by-step procedures including agencies and telephone numbers to be notified, protective clothing and equipment to be used.
- Training of workers in spill containment and clean up.
- Periodically inspect spill kits or emergency response items to maintain availability.
- Review, amend, and update plan as required.

IMMEDIATE RESPONSE RESPONSIBILITIES

Project Manager and Site Supervisor

In the event of a spill, the Project Manager and Site Supervisor shall ensure that the Metric Safety Supervisor is notified immediately and may assist in response action as dictated by the Company. For all hazardous spills, the following protocol

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shall apply:

- The Project Manager and Site Supervisor shall report all spills to the Safety Supervisor immediately.
- The Site Supervisor shall report spills to appropriate federal, provincial, and local agencies if required.
- The Project Manager or Site Supervisor with the assistance of the Safety Supervisor shall mobilize on-site personnel, equipment, and materials for containment and/or cleanup commensurate with the extent of the spill.
- The Site Supervisor shall assist the Emergency Response Contractor and monitor containment procedures to ensure that the actions are consistent with the requirements of this Spill Plan.
- The Safety Supervisor, Project Manager, and Site Supervisor, in consultation with appropriate agencies, shall determine when it is necessary to evacuate spill sites to safeguard human health.
- The Project Manager and Site Supervisor, with the assistance of the Safety Supervisor shall coordinate with appropriate agencies the need to contact additional parties or agencies.
- The Project Manager and Site Supervisor are responsible for completing a Spill Report Form within 24- hours of the occurrence of a spill, regardless of the size of the spill.

Workers

- Metric employees shall notify their immediate Supervisor or the Metric Safety Supervisor immediately of any spill of a hazardous liquid, regardless of volume.

Training

- Metric shall train all employees who handle fuels and other regulated substances to prevent spills and to quickly and effectively contain and clean up spills that may occur in accordance with applicable regulations. (WHMIS)

Equipment

- Metric shall ensure that adequate materials are on hand, to enable the rapid cleanup of any spill which may occur.
- Metric shall maintain spill kits containing a sufficient quantity of absorbent and barrier materials to adequately contain and recover foreseeable spills. These kits may include, but are not limited to, absorbent pads, straw bales, absorbent clay, sawdust, floor-drying agents, spill containment barriers, plastic sheeting, skimmer pumps, and holding tanks.
- Suitable plastic lining materials shall be available for placement below and on top of temporarily stored contaminated soils and materials.
- The Project Manager, Site Supervisor, or the Safety Supervisor shall make known to Metric employees the locations of spill control equipment and materials and have them readily accessible.

IMMEDIATE RESPONSE PROCEDURES

Upon learning of any fuel, oil, hazardous material, or other regulated substance spill, or upon learning of conditions that will lead to an imminent spill, the person discovering the situation shall:

- Initiate actions to contain the fluid that has spilled or is about to spill, and initiate action to eliminate the source of the spill to the maximum extent that is safely possible.
- Notify their immediate Supervisor and/or the Metric Safety Supervisor and provide them with the following information:
 - Location and cause of the spill
 - The type of material that has spilled
 - Whether the spill has reached or is likely to reach any surface water

Secure the site

- Stop construction activity in the area
- Prevent access by unauthorized persons
- Remove or disable potential sources of ignition (for fuel/oil spills)
- Protect adjacent sensitive areas such as storm drains

MOBILIZATION

- The Site Supervisor with assistance of the Metric Safety Supervisor shall mobilize on-site personnel, equipment, and materials for containment and/or cleanup commensurate with the extent of the spill.
- If the Site Supervisor determines that a spill is beyond the scope of on-site equipment and personnel, the Site Supervisor shall immediately notify the Project Manager and the Metric Safety Supervisor that an Emergency Response Contractor is needed to contain and/or clean up the spill.

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- The Site Supervisor shall assist the Emergency Response Contractor and monitor containment procedures to ensure that the actions are consistent with the requirements of this Environmental Program.

SPILL NOTIFICATION RESPONSIBILITIES

The Site Supervisor shall complete a Spill Report Form for each release of a regulated substance, regardless of volume. The Spill Report Form must be submitted to the Metric Safety Supervisor within 24 hours of the occurrence of a spill. To complete the Spill Report Form, the Safety Supervisor shall compile the following information:

- The time, date and location of the spill, and the time and date the spill was discovered.
- Nature of spill (type of hazardous substance).
- Estimated volume of spilled material,
- Area of spill (media in which the spill exists (ex. soil, water, etc.)).
- Weather conditions.
- Cause of the spill.
- Immediate containment and/or cleanup actions taken (if applicable agencies contacted).

Follow-up written reports, associated laboratory analyses, confirmatory field sampling and other documentation may also be required separately.

AGENCY NOTIFICATION

- If required Metric shall report spills to appropriate federal, provincial/territorial, and local agencies as soon as possible.
- Metric and the appropriate federal, provincial/territorial, and local agencies must ensure that additional parties or agencies are properly notified. Additionally, Metric shall ensure that all cleanup activities required by a jurisdictional agency are satisfactorily met and will provide documentation demonstrating this compliance.

Disciplinary Action

In the event that an employee knowingly or willingly neglects their environmental duties while under the employment of Metric, they may be subject to disciplinary action up to and including termination of employment.

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