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Brunel Energy, Inc.

Manual Lifting

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1. Purpose

Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program to set forth procedures for safely lifting materials, taking appropriate organizational measures, or use the appropriate means, in particular mechanical equipment, to avoid the need for manual handling of loads by employees in order to reduce the risk involved in the manual handling of such loads.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Ergonomics** applies information about human behavior, abilities and limitations and other characteristics to the design of tools, machines, tasks, jobs, and environments for productive, safe, comfortable, and effective human use.
- 3.2. **Manual Handling** of loads by means of transporting or supporting of a load by one or more employees, and includes lifting, putting down, pushing, pulling carrying or moving a load, which by reason of its characteristics or unfavorable ergonomic conditions, involves risk, particularly of back injury, to employees.
- 3.3. **Manual lifting equipment** such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists will be provided and utilized by employees as needed.

4. Responsibilities

- 4.1. Manager(s) and HSE Supervisor(s):
 - 4.1.1. Responsible for creating a work environment that encourages safe lifting practices.
 - 4.1.2. Providing education and training to employees regarding the recognition of proper lifting principles.
 - 4.1.3. Responsible for implementing lifting hazard prevention strategies and ergonomically correct practices for safe lifting.

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- 4.2. Employee(s)
 - 4.2.1. Employees will follow safe lifting techniques incorporating manual lifting equipment whenever possible.
- 4.3. Subcontractor(s)
 - 4.3.1. Employees will follow safe lifting techniques incorporating manual lifting equipment whenever possible.

5. Requirements

- 5.1. Always consider individual capability, the nature of the load, environmental conditions, and training.
- 5.2. When lifting manually:
 - 5.2.1. Reduce the amount of twisting, stooping, and reaching.
 - 5.2.2. Avoid lifting from floor level or above shoulder height, especially heavy loads.
 - 5.2.3. Adjust storage areas to minimize the need to carry out such movements.
 - 5.2.4. Consider how you can minimize carrying distances.
 - 5.2.5. Assess the weight to be carried and whether the worker can move the load safely or needs any help; maybe the load can be broken down to smaller lighter components.
- 5.3. When lifting equipment:
 - 5.3.1. Consider whether you can use a lifting aid, such as a forklift or truck, electric or hand-powered hoist, or a conveyer.
 - 5.3.2. Think about storage as a part of the delivery process, maybe heavy items could be delivered directly or close to the storage area.
 - 5.3.3. Reduce carrying distances where possible.
- 5.4. Prior to the lift/carry:
 - 5.4.1. Remove obstructions from the route.
 - 5.4.2. For a long lift, plan to rest the load midway on a table or bench to change up.
 - 5.4.3. Keep the load close to the waist. The load should be kept close to the body for as long as possible while lifting.
 - 5.4.4. Keep the heaviest side of the load next to the body.
 - 5.4.5. Adopt a stable position and make sure your feet are apart, with one leg slightly forward to maintain balance.

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6. Procedure

6.1. Assessment of Risk and Hazard Identification

- 6.1.1. A hazard assessment will be completed before manual lifting is performed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required or is impractical and whether or not a two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried.
- 6.1.2. Supervision will periodically evaluate work areas and employee's work techniques to assess the potential for and prevention of injuries. New operations will also be evaluated to engineer out hazards before work processes are implemented.

6.2. Manual Lifting Equipment

- 6.2.1. Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists will be provided for employees. Other engineering controls such as conveyors, lift tables, and workstation design will also be considered. The Company will enforce the use of provided equipment by employees and provide all necessary training.
- 6.2.2. When moving materials manually, workers should attach handles or holders to loads. In addition, workers should wear appropriate protective equipment and use proper lifting techniques.

6.3. Safety and Accidents Reports

- 6.3.1. All musculoskeletal injuries caused by improper lifting will be investigated, documented, and reported as required by 29 CFR 1904. The Company will determine root cause and incorporate investigation findings into safe work procedures to prevent future injuries.

7. Training

- 7.1. Training should include general principles of ergonomics, proper lifting techniques and avoidance of musculoskeletal injuries, recognition of hazards and injuries, procedures for reporting hazardous conditions, and methods and procedures for early reporting of injuries. Additionally, job specific training should be given on safe work practices, hazards, and controls.
- 7.2. Training shall be provided upon hire and annually thereafter.

8. Recordkeeping

- 8.1. Incident Reports will be completed should an injury occur.

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9. Reference

- 9.1. McCormick and Saunders, 1993
- 9.2. National Institute for Occupational Safety and Health (NIOSH), DHHS, Work Practices Guide for Manual Lifting. 1981, 1991 and 1997.