

Document Summary

Document Title:

Alcatel Lucent Subcontractor EHS Manual

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SUBCONTRACTOR EHS MANUAL**

Edition: 2.0

Effective Date: 14 December 2010

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Document Change History

Edition Number	Reason and Description of Change	Affected Pages	Effective Date
1.0	New	All	18 December 2007
2.0	Updated Document Title, Owner, Author and Approvers on Title page, Updated Purpose and scope to expand the manual beyond the Services BG as detailed in the scope. Added definition of Touch potential and modified definition of Electronic scrap. Verbiage modifications overall in sections 4 and 5 and added section 5.15 on Motor Vehicle Safety. Revised Appendix 1 with contact Regional contact information	All	14 December 2010

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34 1 Purpose

35 The subcontractor (defined below) shall meet these Environment, Health and Safety (“EHS”)
36 requirements when conducting work under contract to or on behalf of any entities related to or
37 affiliated with Alcatel Lucent (“Alcatel Lucent Entity”). These requirements do not supersede any
38 other requirements, such as those described in applicable contracts between Alcatel Lucent and
39 the supplier or in the applicable national or local law and/or regulation, but are intended to
40 enhance and complement them.

41 As part of the EHS Policy, and overall EHS Management System, Alcatel Lucent requires that its
42 Subcontractors:

- 43 ➤ Comply with all applicable EHS laws, regulations, and industry standards; and
- 44 ➤ Comply with all EHS requirements contained in the contract with the applicable Alcatel
45 Lucent Entity and this manual. In the event of a conflict between the terms and conditions
46 of any such contract and this document, the terms and conditions of such contract shall
47 prevail.

48 *Subcontractors* are responsible for the health and safety of their employees and subcontractors,
49 and for the safe and environmentally acceptable performance of their work. Nothing in this
50 document is intended to alter that responsibility in any way, or to shift that responsibility, in
51 whole or in part, to Alcatel Lucent or its subsidiaries, or their respective customers.

52 This manual sets out Alcatel Lucent’s EHS expectations of all subcontractors of Alcatel Lucent
53 Entities as defined in the scope and provides guidance in how these expectations can be met. All
54 EHS documentation associated with the requirements of any work to be performed by a
55 Subcontractor must be provided to the applicable Alcatel Lucent Entity upon request.

56 2 Scope

57 The requirements outlined in this document apply to subcontractors hired to perform services and
58 can be used as a guidance document for the services including, but not limited to, construction
59 activities, equipment installation or de-installation, maintenance or repair activities, or managed
60 services for or on behalf of any Alcatel Lucent Entity.

61 3 Definitions and Acronyms

62 The following definitions apply to this document:

63 **Alcatel Lucent Entity** - Alcatel Lucent or the Alcatel Lucent Entity or Entities for which the
64 Subcontractor is working.

65 **Authorized** - Those people permitted in a work area by any Alcatel Lucent Entity or the
66 Subcontractor because they are aware of the potential hazards and the precautions to be taken.

67 **CAS** - [Chemical Abstract Service](#) - The [CAS REGISTRY](#) is a database of chemical substance
68 information in the world ([view current numbers](#)).

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- 70 **Chemical** - Any solid, liquid, or gas that can be a hazard to employees or the environment under
71 normal conditions of use or in emergencies, as well as any material specifically regulated by
72 import or export regulations. Consumer products are not included under this definition.
- 73 **Competent Person** - An individual who, by way of training and experience, is knowledgeable of
74 applicable standards, capable of identifying workplace hazards or environmental aspects relating
75 to the specific operation, designated by the employer, and has the authority to take appropriate
76 actions.
- 77 **Confined Space** - An area that has limited or restricted means of entry or exit, is large enough for
78 a person to enter and perform work, and is not designed for continuous occupancy. Such area may
79 have an atmosphere that contains potentially harmful levels of a contaminant, may not have a
80 safe oxygen level, or may cause engulfment.
- 81 **Electronic Scrap** - .Electrical scrap refers to electronic equipment which has been discarded,
82 become obsolete, ceased to function, is no longer wanted by its owner or for any other reason has
83 become available for recycling or disposal. Electronic equipment means equipment that is
84 dependent on electric current or electromagnetic fields in order to work and typically contains
85 one or more printed circuit boards. It includes all components, subassemblies and consumables
86 which are part of the product at the time of discarding and is a concern since components of such
87 equipment may contain toxic materials and are not biodegradable
- 88 **Hazardous Energy** - Includes, but is not limited to, electrical, chemical, electromagnetic,
89 pneumatic, mechanical, thermal, hydraulic, spring activation, and gravitational that could cause
90 injury if released inadvertently.
- 91 **Hazardous Waste** - Materials deemed hazardous waste in the country of origin or generation, or
92 by international convention or treaty, which are being discarded, sent off site for
93 recycle/recovery, treated, or stored. Hazardous waste requires special handling as prescribed,
94 mandated, and/or regulated by the country in which the material is being generated and/or the
95 country to which it is being shipped for final disposition.
- 96 **Hot work** - Any work involving burning, welding, torch cutting, grinding where sparks are
97 produced, soldering, or brazing in construction, maintenance and fabrication.
- 98 **Optical Fiber Communication Systems (OFCS)** - Class 1 laser systems that can be embedded with
99 higher classes of lasers. There is no access to the embedded laser because of protective housings;
100 therefore it is an enclosed system. During installation, test and maintenance, OFCS are
101 considered unenclosed systems.
- 102 **Radio Frequency (RF)** - The form of electromagnetic emissions that may present an
103 environmental or health impact from radio technologies and, more specifically, mobile telephony.
- 104 **Service** - Any service provided to or on behalf of an Alcatel Lucent Entity that includes, but is not
105 limited to, construction activities, equipment installation or de-installation, repair and
106 maintenance activities, or managed services.
- 107 **Shall** - A requirement for compliance that must be followed.
- 108 **Should** - A recommendation that is not required, but would help to improve EHS performance.
- 109 **Subcontractor** - A third party from whom the Alcatel Lucent Entity or Entities acquire services for
110 internal use or resale to customers. The Subcontractor is sometimes referred to as a

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111 “contractor,” “supplier,” or “seller” when viewed from the perspective of an Alcatel Lucent
112 customer.

113
114 **Tools** - All tools, equipment, and materials (“Tools”) including Personal Protective Equipment
115 (“PPE”).

116 **Touch Potential** - It is the voltage between the energized object and the feet of a person in
117 contact with the object. It is equal to the difference in voltage between the object (which is at a
118 distance of 0 feet) and a point some distance away.

119

120 4 Requirements for all Projects

121 4.1 General Requirements

122 a. As noted above in Section 1, the requirements set forth in this manual are the minimum
123 expectation of all Alcatel Lucent Entities. No Alcatel Lucent Entity may make
124 representations, guarantees, or warranties that these requirements, by themselves,
125 represent appropriate safety practices as may be reasonable and customary in the
126 industry, nor shall any statements by any Alcatel Lucent Entity’s employees or agents be
127 interpreted as making any such representation, guarantee, or warranty. Subcontractor
128 remains liable for the safe performance of the work and the Alcatel Lucent Entity reserves
129 all rights and does not waive any claims regarding the safe performance of the work.

130 b. The Subcontractor shall take all reasonable actions to prevent, personal injuries and
131 environmental incidents associated with the work to be performed.

132 c. The Subcontractor must designate an EHS representative who will be responsible for
133 ensuring that EHS requirements are followed at all work sites (“EHS Representative”). The
134 Subcontractor may designate one of its subcontractors’ employees as the EHS
135 Representative, but the Subcontractor will remain directly responsible for the EHS
136 performance and compliance with this manual and all applicable laws and regulations. In
137 short, compliance with this manual and all applicable laws and regulations, as well as any
138 additional contractual obligations, are non-delegable duties that must remain with the
139 Subcontractor directly contracting with the Alcatel Lucent Entity.

140 d. Subcontractors shall hold a daily tool box safety meeting covering the precautions to take
141 for that day’s work.

142 e. Safe access and egress to the work site must be maintained at all times.

143 4.2 Training

144 a. The Subcontractor shall ensure that Subcontractor’s employees and the employees of
145 Subcontractor’s subcontractors, if any, receive appropriate training and instructions and
146 are both competent and able to perform the work in a safe and environmentally
147 acceptable manner.

148 b. Subcontractor shall provide acceptable proof of qualifications, safety training or
149 certifications for all such employees to the applicable Alcatel Lucent Entity upon request.

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150 4.3 Emergency Response

- 151 a. The Subcontractor shall immediately respond to emergency situations involving
152 Subcontractor's personnel and those activities directly under the Subcontractor's control
153 (including the control of any of the Subcontractor's subcontractors) commensurate to the
154 event.
- 155 b. On any Alcatel Lucent Entity premises, the Subcontractor shall become familiar with and
156 follow the appropriate local emergency response plan and notification procedures.
- 157 c. On an Alcatel Lucent customer's premises, the Subcontractor shall become familiar with
158 and follow the emergency response plan and notification procedures prescribed by such
159 customer.
- 160 d. In the absence of a customer emergency response plan, the Subcontractor shall develop
161 and follow its own *Emergency Response Plan*, which plan shall include the appropriate on-
162 site response to emergencies and the notification of the appropriate external authorities
163 and emergency response personnel in a timely manner.
- 164 e. The *Emergency Response Plan* shall address the actions to be taken by the Subcontractor's
165 personnel or subcontractors in response to accidents, injuries, work-induced illnesses or
166 other life threatening events (including, but not limited to, fire, severe weather,
167 earthquakes, and terrorism), and any other event that creates or could reasonably create
168 an emergency situation.

169 4.4 Notification

- 170 a. The Subcontractor shall make all legally required accident notifications to the appropriate
171 authorities within the time limits prescribed by such authorities.
- 172 b. The Subcontractor shall notify the applicable Alcatel Lucent Entity representative as soon
173 as reasonably possible after personal injuries, fatalities, environmental incidents, property
174 damage or regulatory inspections, but only after the appropriate response actions,
175 commensurate with the emergency, have been taken so that such notification does not, in
176 any way, delay the emergency response time.

177 4.5 Pre-Job Risk Assessment

- 178 a. Prior to commencing services, the Subcontractor shall conduct and document, with all
179 involved parties, a pre-job risk assessment of the operations, facilities, and equipment
180 applicable to the work to be performed.
- 181 b. The Subcontractor must promptly notify the applicable Alcatel Lucent Entity
182 representative of any defect, unsafe, unhealthful, or environmentally unsound condition
183 that prevents or may prevent the proper performance of the Subcontractor following the
184 pre-job risk assessment.

185 4.6 Site Inspections/Corrective Actions

- 186 a. The Subcontractor shall conduct and document periodic site inspections to identify and
187 correct any observed or potentially unsafe or environmentally unacceptable conditions.

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- 188 b. Documented periodic site inspections must be made available to the applicable Alcatel
189 Lucent Entity or any of their representatives upon request.
- 190 c. The Subcontractor shall promptly correct any observed or potentially hazardous conditions
191 at the Subcontractor's expense.

192 5 Programs & Specific Requirements**193 5.1 Banned Substances**

194 Subcontractor shall follow Alcatel Lucent's minimum requirements on Banned/Restricted Materials
195 as applicable to work being performed (*Reference: Alcatel Lucent Banned Substances List*). The
196 following substances shall not be used at any Alcatel Lucent location or customer premises.

- 197 a. Hexavalent chromium-containing water treatment chemicals (CAS# 15930-94-6, and
198 others).
- 199 b. Lead containing paint (CAS# 7439-92-1, and others).
- 200 c. Asbestos (CAS# 1332-21-4 and others) / asbestos-containing materials.
- 201 d. Polychlorinated biphenyls (PCBs) (CAS# 1336-36-3, and others).
- 202 e. Chlorofluorocarbons (CFCs) *Note: CFCs may be used by individuals certified/licensed in*
203 *accordance with applicable EHS laws and regulations as refrigerants for chillers or*
204 *refrigeration systems that are original, integral components of existing facility*
205 *equipment (e.g., cooling system refrigerant).*
- 206 f. Organo-Tin compounds.
- 207 g. Polychlorinated terphenyls (PCTs) (CAS# 61788-33-8)

208 5.2 Chemical Management

- 209 a. All chemicals used in the course of the work shall be included in the risk assessment.
- 210 b. The Subcontractor is responsible for ensuring that all users are properly trained in the safe
211 use and disposal of any hazardous material or chemical involved in or related to the
212 project.
- 213 c. Chemicals and other hazardous materials must be properly labeled with the name of the
214 chemical or material and its environmental, safety, and/or health hazards.
- 215 d. Appropriate personal protective equipment shall be used when handling chemicals,
216 including, but not limited to, hazardous materials or chemicals.
- 217 e. Chemicals and other hazardous materials shall be properly stored according to the
218 manufacturer's recommendations and any applicable law or regulation.
- 219 f. Except for materials intended to be left as part of a project deliverable chemicals and
220 other hazardous materials shall be removed from an Alcatel Lucent Entity or customer
221 premises upon completion of the work activities.

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- 222 g. Material Safety Data Sheets (“MSDSs”) shall be readily available to the Alcatel Lucent
223 Entity and the individuals working on the site for any hazardous materials and chemicals as
224 applicable and provided upon request.

225 5.3 Barricades, Signs, & Perimeter Guarding

- 226 a. Signs and temporary guarding, such as cones, tape, and posting guards shall be used to
227 warn individuals of potentially hazardous situations caused by or relating to the work
228 being performed. Such work shall include, but not be limited to, excavation, trenching,
229 electrical, building construction, tower erection or climbing, antenna installation, and
230 cable work. All barricades shall be appropriate for the application, visible, legible, and
231 able to withstand any adverse conditions present at the work site and comply with all
232 applicable laws and regulations.
- 233 b. If the work restricts traffic on a roadway, warnings such as signs, cones, flags, sign/traffic
234 worker(s), or other means of communication as appropriate shall be provided. Proper
235 precautions should be taken to communicate the restrictions and re-direct the traffic
236 accordingly. The initial warning sign shall be located and maintained at least 300 meters,
237 (1,000 feet), ahead of the work at all times. All applicable EHS work zone laws and
238 regulations must be followed.

239 5.4 Confined Space Entry & Rescue

- 240 a. The Subcontractor shall establish and maintain a Confined Space Entry & Rescue Program
241 if required to enter confined spaces.
- 242 b. All confined spaces encountered during the course of the work shall be evaluated for
243 hazards before entry is allowed. Classification of the space shall be documented (e.g.,
244 entry permit required) and enforced.
- 245 c. Atmospheric monitoring shall be performed to detect hazardous atmospheric conditions in
246 confined spaces (such as manholes and vaults) prior to entry and such monitoring shall be
247 documented. These spaces shall be properly ventilated prior to and during entry in
248 accordance with applicable EHS laws and regulations. One person shall stand guard
249 outside the confined space whenever another person enters it, and shall be appropriately
250 trained and ready to implement emergency procedures without putting themselves at risk
251 in order to help that person if necessary. During a confined space entry, a mechanical
252 means to extract a worker from the space must be available and in use in the event an
253 emergency situation arises.
- 254 d. No entry shall be allowed into a confined space that has an atmosphere that is
255 immediately dangerous to life or health.

256 5.5 Appropriate Dress & Personal Protective Equipment (“PPE”)

257 Subcontractor is responsible for ensuring that PPE identified during the pre-job risk assessment is
258 available to and worn by employees who will perform the work.

- 259 a. Subcontractor's employees shall dress appropriately for the work being performed.
- 260 b. Safety glasses must include attached side shields and shall be worn whenever there is a
261 potential eye hazard from flying objects or when specified as a requirement at the site
262 (whether under the contract or by law or regulation governing the work site).

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- 263 c. Appropriate footwear shall consist of, at a minimum, sturdy work boots or shoes. *Note:*
264 Athletic shoes (e.g., sneakers) are not considered adequate work footwear.
- 265 d. Steel-toe safety shoes may be required if identified in the risk assessment or if it is an
266 onsite customer requirement.
- 267 e. Hard hats shall be worn whenever there is a danger of being struck by falling objects,
268 striking the head on a hard or sharp surface, or whenever it is an onsite customer
269 requirement. Non-conductive hard hats shall be utilized when performing electrical work.
- 270 f. Neckties, loose fitting clothing, chains, watchbands, rings, and earrings should not be
271 worn when working near equipment with rotating parts.
- 272 g. Metal jewelry should not be worn while working on “live” electrical equipment.
- 273 h. Long hair should be appropriately restrained so it does not present a hazard from moving
274 parts of equipment and machinery.
- 275 i. Reflective vests shall be worn when working on or near public roads, railways, or highways
276 and whenever high visibility is required.

277 5.6 Electrical Safety

- 278 a. The Subcontractor shall develop and follow its own Electrical Safety procedures for
279 ensuring that any requirements applicable to the type of job being done are addressed in
280 accordance with applicable EHS laws and regulations (i.e. training,
281 certificates/licenses/permits, etc).
- 282 b. The Subcontractor’s procedures shall include steps for ensuring that equipment with
283 hazardous energy is not inadvertently released while someone is working on it.
- 284 c. Ground fault circuit interrupter (“GFCI”) [also known by the term, *residual current circuit*
285 *breaker* or *ELCB (earth leakage circuit breaker)*] shall be used on all portable tools and
286 equipment utilized on outdoor construction/installation sites or when requested by the
287 customer. Low voltage tools or isolating transformers must be used if required by local
288 regulations.
- 289 d. Portable electrical hand tools shall be double-insulated or grounded.
- 290 e. Extension cords shall not be damaged, taped, or repaired.
- 291 f. The Subcontractor shall not place any materials such that they limit access to electrical
292 panels (ie. ~1 meter or 36 inches) on any Alcatel Lucent Entity’s or any customer’s
293 premises.
- 294 g. Electrically insulated tools, fire retardant clothing, or insulating matting may be required,
295 depending on the job requirements and local regulations.
- 296 h. Before commencing work, when possible, systems should be de-energized and appropriate
297 lock-out/tag-out procedures followed.

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298 5.7 Overhead Power Lines

- 299 a. The Subcontractor's and its subcontractors' employees shall exercise extreme caution
300 when working with aerial lift devices, cranes, and other equipment that is operating near
301 overhead electrical lines.
- 302 b. The Subcontractor's EHS Representative shall be made aware of any site-specific hazards
303 such as voltage of electrical utility overhead power lines, adverse weather conditions,
304 vehicle and pedestrian traffic, etc. No changes to work plans shall be made without the
305 prior approval of the Subcontractor's EHS Representative.
- 306 c. The work site shall be barricaded with appropriate signage and perimeter guarding in
307 accordance with [Section 5.3](#).
308
- 309 d. A minimum distance of 4.5 meters or 15 feet from electrical utility overhead power lines
310 and un-insulated, exposed and energized parts (e.g., transformers and capacitors) shall be
311 maintained at all times.
- 312 e. An appropriate safe distance defined by the electrical utility company must be
313 maintained.
- 314 f. If the minimum distance listed above cannot be maintained, the Subcontractor's EHS
315 Representative shall specify the appropriate procedures and precautions that may include:
- 316 1. The use of insulating gloves, blankets, or covers.
- 317 2. A pre-job meeting shall be held before each work shift to make sure all options to
318 ensure safety are covered and that all personnel on the work site are informed as
319 to the work safety plan and understand how to comply with it.
- 320 3. An observer when equipment is within touch potential of exposed energized
321 overhead lines.
- 322 g. When the voltage of electrical utility overhead power lines is greater than 20,000 volts to
323 ground, the electrical utility company shall be notified and requested to take appropriate
324 protective measures. Any other necessary related actions as identified in the pre-job risk
325 assessment must also be taken.

326 5.8 Safe Operations of Mechanical & Electrical Equipment

- 327 a. The Subcontractor shall instruct and train its employees in the safe operating procedures
328 and hazards of all mechanical and electrical equipment. Training must be documented
329 and conducted in accordance with applicable EHS laws and regulations.
- 330 b. All mechanical and electrical equipment shall be operated and maintained according to
331 the manufacturer's recommendations.
- 332 c. All mechanical and electrical equipment shall be inspected before each use. The
333 equipment shall not be used unless it is found to be free of defects that would affect its
334 safe use.

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335 5.9 Excavation and Trenching

- 336 a. The Subcontractor shall identify any potential hazards, including, but not limited to, the
337 location of existing underground utilities, and obtain all required approvals before
338 beginning any excavation, trenching, or other digging operations. This requirement
339 includes following all of the applicable national, state, and local laws, including, but not
340 limited to, any notice requirements, securing the services of locate services, and
341 performing the excavation and trenching within the guidelines provided by national, state,
342 and local laws and regulations.
- 343 b. In the absence of national, state, or local laws or more stringent industry standards, the
344 following shall apply to all excavations or trenches greater than 1.5 meters (5 feet) deep
345 into which workers will enter shall:
- 346 1. The trench or excavation must be shored, sloped, braced, or otherwise supported
347 to prevent cave-ins, unless the excavation is in stable rock.
 - 348 2. Ladders must be placed no more than 8 meters (25 feet) apart, for immediate
349 egress.
 - 350 3. Tools, machines, or excavated material must be placed no closer than 60
351 centimeters (2 feet) from the edge.
 - 352 4. Adequate ventilation must be ensured when operating equipment with internal
353 combustion engines.
- 354 c. Appropriate warning signs, barricades, and other perimeter guarding shall be used to
355 prevent workers and members of the public from falling into the excavation.
- 356 d. If, during excavation, unknown materials are unearthed, the Subcontractor must stop the
357 work immediately, notify their EHS representative, determine the nature of the materials,
358 and take the appropriate measures to protect human health and the environment before
359 proceeding. Measures taken must be in accordance with applicable EHS laws and
360 regulations.

361 5.10 Fall Protection, Tower Climbing, & Ladder Safety

- 362 a. Fall protection shall be utilized whenever workers are exposed to the potential of falling 2
363 meters (6 feet) or more to a lower level, when working above dangerous equipment, or
364 operating certain equipment, unless otherwise prescribed in a national, state, or local law
365 or regulation.
- 366 b. Fall protection may be accomplished by using appropriately supported guardrails, parapets
367 1 meter (39 inches) or more high, safety nets, or personal fall arrest systems. Examples of
368 jobs where fall protection shall be used includes, but is not limited to:
- 369 1. Tower climbing - *no free climbing is ever permitted*;
 - 370 2. Roof top work within 2 meters (6 feet) of an unprotected edge;
 - 371 3. Aerial lifts such as scissor lifts, boom lifts, and bucket trucks; and

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- 372 4. Climbing unprotected (ie. no protective cage), fixed ladders greater than 7
373 meters (20 feet) in length.
- 374 c. Anyone found not wearing a personal fall arrest system where one is required shall be
375 immediately removed from the work site. The Subcontractor site supervisor may also be
376 removed from the project, depending on the circumstances.
- 377 d. Where personal fall arrest systems are required, the Subcontractor shall provide:
- 378 1. A competent person on the work site who is able to recognize fall hazards and
379 take necessary corrective actions;
- 380 2. A full body harness, shock absorber, lanyard or lifeline, double-locking hardware,
381 and other equipment suitable for the nature of the work;
- 382 3. Training to all fall protection system users;
- 383 4. Tower climbers with appropriate training and evidence on request (ie. training
384 certificates, training rosters, etc). Contact an Alcatel Lucent EHS Representative
385 (see [Appendix 1](#)) for a list of companies that offer tower climbing certification;
- 386 5. Inspection of Personal Fall Arrest System components prior to each day's use;
387 defective equipment shall not be used; and
- 388 6. A second person to be permanently available for surveillance and be able to call
389 for emergency services in case of an accident. *Note: It may be required in some*
390 *countries that this person be trained.*
- 391 7. An Emergency Action Plan applicable to the operation requiring the need to wear
392 Fall Protection Equipment.
- 393 Climbing under adverse weather conditions such as rain, snow, wind, etc., shall be
394 avoided unless an emergency exists.
- 395 e. When using ladders, the following practices shall be followed:
- 396 1. All ladders shall be inspected and shall be in good condition prior to each use;
- 397 2. Ladders must be nonconductive (wood, or fiberglass with a plastic top) if being
398 used where the person on the ladder or the ladder could come in contact with
399 energized parts of equipment, fixtures or circuit conductors;
- 400 3. Stepladders shall be used only in the fully opened, locked position;
- 401 4. All ladder feet shall be positioned on secure, even surfaces; and
- 402 5. All employees that use ladders shall be instructed in the proper use of ladders.

403 5.11 Fire Protection

- 404 a. Suitable fire extinguishers shall be available for work operations capable of starting a fire,
405 such as welding, cutting torches, cut-off saws, etc.

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- 406 b. Fire extinguishers should be inspected regularly and maintained and used as per
407 manufacturer's recommendations and applicable EHS laws and regulations. Training in the
408 use of fire extinguishers may be required by applicable EHS laws and regulations.
- 409 c. Access to wall mounted fire extinguishers and fire alarm/pull stations shall be maintained
410 and unobstructed.
- 411 d. Keeping fire doors open and disabling fire alarms/panels, smoke detectors, heat detectors
412 and sprinkler systems is not permitted unless authorized by an Alcatel Lucent and/or
413 customer premises representative.
- 414 e. A hot work permit system is required for hot work.

415 5.12 Waste, Hazardous Waste & Contaminated Scrap

- 416 a. Waste generated on Alcatel Lucent and customer premises must be managed in
417 compliance with applicable regulatory provisions.
- 418 b. If the work being performed requires the applicable Alcatel-Lucent Entity to take
419 ownership or arrange for the disposal of hazardous waste or electronic scrap,
420 Subcontractor should contact the Alcatel Lucent EHS representative (see [Appendix 1](#)) for
421 guidance in selecting Alcatel Lucent approved waste/scrap processing facilities.

422 5.13 Radio Frequency ("RF") Safety

- 423 a. The Subcontractor or Subcontractor's personnel shall have and maintain an RF Safety
424 Program, including RF training, if workers are operating in an RF environment.
- 425 b. The pre-job risk assessment should include evaluating potential exposure to RF.
- 426 c. Only trained workers may operate around transmitting antennas.
- 427 d. Visually assess types and mounting location of transmitting antennas on operating site and
428 identify transmitting antennas when possible, taking into account that there is no RF risk
429 associated with "Receive Only" or non-operational antennas.
- 430 e. Instructions on all RF warning signs/labels/placards must be obeyed.
- 431 f. Whenever possible, never work directly in the compliance boundary or in front of an
432 active antenna or within the "Stand-Off Distance."
- 433 g. If operations need to be performed within the compliance boundary, within the "Stand-Off
434 Distance," or on or in front of a transmitting antenna, request the customer to switch off
435 transmission following the customer's lock-out/tag-out procedures.
- 436 h. If the above-mentioned lock-out/tag-out is not possible, a dosimetric assessment shall be
437 performed to determine if the exposure can be maintained within allowable limits during
438 the worker's operation. The EHS Representative may allow the worker to operate under
439 certain conditions provided exposure can be maintained within allowable limits recognized
440 by applicable EH&S laws and regulations. This dosimetric assessment shall be made
441 available to the applicable Alcatel Lucent Entity on request.

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Edition: 2.0

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442 5.14 Laser Safety

- 443 a. Subcontractors or the Subcontractor's personnel shall have and maintain a Laser Safety
444 Program, including Optical Fiber Communications Systems (OFCS) training, if workers are
445 operating an OFCS.
- 446 b. The Subcontractor should refer to the product installation guide as applicable to product.

447 5.15 Motor Vehicle Safety

- 448 a. While driving motor vehicles on company business such as cars, off road vehicles or
449 motorcycles, all Contractor employees operating vehicles under contract with Alcatel
450 Lucent shall
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- 453 1. Possess a valid driver's license.
 - 454 2. Comply with all applicable local traffic laws and regulations;
 - 455 3. Wear safety belts while driving or riding in a motor vehicle and ensure that all
456 passengers wear safety belts (if provided for all seats)
 - 457 4. Not use a mobile phone unless the vehicle is parked or in hands free mode where
458 allowed by local laws.
 - 459 5. Not engage in texting unless parked.
 - 460 6. Not to drive a vehicle if fatigued ,in order to prevent drowsy driving
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- 463 b. And shall not drive a motor vehicle:
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- 466 1. that is found to be potentially unsafe.
 - 467 2. that does not have all of the required documents on board.
 - 468 3. while under the influence of drugs or alcohol.
 - 469 4. with a medical condition or while taking medications that may impair driving.
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- 472 c. All supervisors of employees who drive motor vehicles on company business **shall**:
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- 475 1. Ensure supervised employees are familiar with these Motor Vehicle Safety
476 Provisions;
 - 477 2. *Ensure that their supervised employees complete Driver Safety Training or local
478 equivalent (if required by EHS laws and regulations) before driving on company
479 business; Ensure drivers designated to operate regular or commercial vehicles
480 requiring special training, license and/or medical surveillance applicable to
481 vehicles size and use are up-to-date .*
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3. Ensure all required vehicle documents are updated (e.g., vehicle registration and insurance) and on board.
 4. Ensure that all vehicles are preventively maintained according to the manufacturer's specifications, ensure that all deficiencies are corrected and keep records.
- d. All motor vehicles being operated as part of a Project assigned by ALU *shall* be provided at least with the following safety features:
1. Safety belts (front and back).
 2. Replacement tire, unless car is equipped with run flat tire.
 3. Jumper cables.
 4. Safety Signs (2 reflective triangles) in addition to whatever else may be required by local or country regulations.
 5. Air bags as required by local or country regulations.
 6. Properly installed cargo barrier between passenger and equipment compartments (if vehicle used to transport tools and/or equipment).
 7. A first aid kit and fire extinguisher (if locally required by transit or insurance requirements).
 8. Valid insurance as required by law.

521 6 Subcontractors

522 The Subcontractor shall use reasonable efforts to pre-qualify their subcontractors at any tier and
523 include EHS performance requirements in the selection criteria. Selection should be based
524 upon acceptable responses. Documentation should be provided on request.

525

526 7 Appendix 1 - Alcatel-Lucent EHS Contact Information

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Edition: 2.0 Effective Date: 14 December 2010

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