



State of Alaska
Department of Labor & Workforce Development
Division of Labor Standards and Safety

AKOSH Program Directive 12-05

Date: July 27, 2012

To: Distribution List

From: Grey R. Mitchell, Director 

Subject: Trident Seafoods Corporation Partnership Project

This Program Directive, PD 12-05, will implement the Trident Seafoods Corporation Partnership Agreement Project. This project provides for a voluntary partnership between the State of Alaska and the Trident Seafoods Corporation. The goal of this partnership is to improve worker safety and health in the seafood industry.

This new partnership agreement project will follow OSHA guidelines and utilize information derived from Alaska Occupational Safety and Health Program Directives:

1. OSHA Strategic Partnerships for Worker Safety and Health — CSP 03-02-002 and AKOSH PD 07-12;
2. Consultation Policies and Procedures Manual — CSP 02-00-002;
3. AKOSH PD 03-01 — High Hazard Targeting Plan

This program directive becomes effective immediately. Please ensure that all members of your staff receive the Trident Seafoods Partnership Project and this program directive, and understand how to implement it.

Attachment: *Trident Seafoods Corporation Partnership Agreement – dated 5/8/12 Renewal.*

Distribution List with attachment

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ALASKA DEPARTMENT OF LABOR
&
WORKFORCE DEVELOPMENT

LABOR STANDARDS and SAFETY DIVISION

OCCUPATIONAL SAFETY & HEALTH

TRIDENT SEAFOODS CORPORATION

PARTNERSHIP AGREEMENT

May 8, 2012
(Renewal)

(Original Partnership Agreement AKOSH PD 06-10 dated June 19, 2006)

I. PARTNERSHIP AGREEMENT PARTNERS

The partners to this Partnership Agreement are the State of Alaska Department of Labor and Workforce Development, Occupational Safety and Health (AKOSH) and the Trident Seafoods Corporation (Trident).

II. BACKGROUND

Trident is one of the largest and most diversified seafood companies operating in the state of Alaska. Trident has been included on Alaska's High Hazard Targeting list due to the well-known inherent dangers associated to the Alaskan commercial seafood industry.

The hazards associated with this type industry are well documented. The most prevalent hazards pertain to the following: confined spaces, operation of powered industrial trucks, lockout/tag-out, point of operation guarding, falls in general industry, electrical hazards posed by working in wet environments, emergency response issues related to the storage and handling of anhydrous ammonia, respirator hazards related to emergency response, noise exposure, emergency egress, fire prevention, use of compressed air, welding hazards, personal protective equipment, and hazard communication issues. Managing these hazards is complicated by Trident's frequent use of temporary employees, many of whom do not speak or understand English. Language and cultural obstacles require Trident to make special efforts to ensure all workers receive adequate safety training in various processing plant operations, but particularly in the safe operation of powered industrial trucks, safe operation of machinery and lockout/tag-out procedures.

The partners' goals are to reduce and/or eliminate serious hazards and improve employee safety training and involvement in Trident's safety and health management system. In this regard, the partners recognize the importance and value of exerting leadership by bringing their respective skills to bear in a cooperative, focused, voluntary effort to ensure a safe and healthful environment for all personnel involved.

To facilitate AKOSH's goal of reducing occupational-related fatalities and serious injuries in the industry, as outlined in the Agency's strategic plan, AKOSH and Trident have agreed to renew the previous 5 year agreement as outlined in the AKOSH Program Directive 06-10. In addition to the previously established goals, the following goals

have been agreed upon by AKOSH and Trident.

III. GOALS

Goal	Strategy/	Measure
1. Prevent and reduce employee injuries and illnesses	a. Develop a companywide reporting system to capture all incidents and near misses. b. Conduct comprehensive root cause analysis for all incidents and analyze trends. c. Develop site specific follow up actions based on the trends.	<ul style="list-style-type: none"> • TCIR rates • DART rates
2. Expand awareness of the value of the Safety and Health Management System	a. Increase employee participation in implementation of the site specific programs b. Recognize participants that successfully achieve S&H goals	<ul style="list-style-type: none"> • Number of individual recognitions • Number of sites recognized under the AK SHARP and VPP
3. Improve communication and knowledge sharing between individual seafood processing plants	a. Develop, implement and share best practices within the company.	<ul style="list-style-type: none"> • Number of best practices, success stories, lessons learned, and case studies shared
4. Establish a middle management training program that will be cooperatively developed to provide the targeted needs of Trident and the fish processing industry as a	a. Develop seafood company specific 10 hour class b. Conduct OSHA 10 hour training for Trident's key production supervisory personnel c. Improve the frontline	<ul style="list-style-type: none"> • Number of training classes • Number of trained middle management or key supervisory employees.

whole.	employee training through the implementation of the middle management train-the-trainer program	
5. Promotion of the Partnership Agreement between Trident AKOSH through periodicals, advertising, public presentations and promotional outreach efforts of both parties.	a. Create/disseminate safety and health materials related to seafood industry to include general seafood industry 10-hour safety training curriculum	<ul style="list-style-type: none"> • Number of promotional publications, presentations, and participations in Statewide events.

IV. PARTNERSHIP ROLES AND RESPONSIBILITIES

The partners to this Partnership Agreement are the State of Alaska Department of Labor and Workforce Development, Occupational Safety and Health (AKOSH) and Trident Seafoods Corporation (Trident).

V. ANNUAL PARTNERSHIP EVALUATION

By March 1 of each year, if the partnership remains active, Trident and AKOSH shall conduct an evaluation of the partnership which will examine the following factors: Total Case Incident Rate (TCIR) and Days Away Restricted and Transfer (DART) rates for Alaska plants, evaluation of meeting the partnership goals, and recommendations for improvement. Trident will include in its evaluation a summary of safety and health program improvements, equipment improvements and lessons learned while working to improve the company's safety and health management system.

VI. EMPLOYER/EMPLOYEE RIGHTS

This partnership does not preclude employees and/or employers from exercising any right provided under the OSH Act, nor does it abrogate any responsibility to comply with rules and regulation adopted pursuant to the Act.

IX. PARTNERSHIP AGREEMENT TERMS

Modifications and amendments of the agreement can be provided by any signatory and they shall be implemented only upon consensus between Trident and AKOSH. The Agreement can be renewed at the end of the three-year term. The Partnership Agreement is non-transferable to non-Trident controlled entities.

For the duration of the Partnership, Trident plants will be placed on a lower priority general scheduled inspection list for enforcement. Should Trident receive an AKOSH citation for an alleged violation, Trident may receive an additional 10% reduction for "good faith" as provided for in the AKOSH Field Operations Manual for participation in this strategic partnership.

Un-programed enforcement inspections conducted in response to complaints, referrals, accidents, and fatalities shall be conducted in accordance with established Federal OSHA and AKOSH procedures.

The AKOSH consultation visits will follow the AKOSH Consultation Policies and Procedures Manual CSP 02-00-002.

X. TERMINATION

The agreement will terminate three years from the date of the signing. If any signatory of this agreement wishes to terminate their participation prior to the established termination date, written notice of the intent to withdraw must be provided to all other signatories.

If any Trident facility in Alaska receives a citation classified as willful or failure-to-abate which has become a final order within the last three years, that site will not be accepted for partnership. In addition, if a Trident facility receives a willful or failure-to-abate citation during the term of this agreement, the site will be terminated from the partnership agreement. Enforcement inspections conducted at

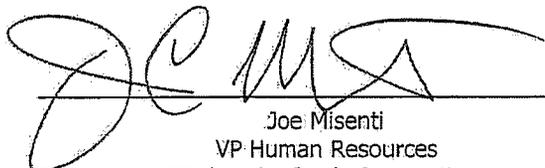
partnership sites resulting in numerous violations (more than three) or high-severity serious violations may result in Trident's disqualification as a partnership site by AKOSH.

XI. SIGNATURE PAGE



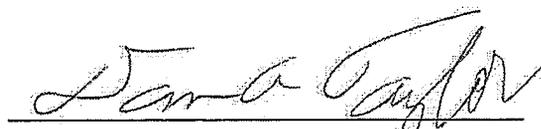
Grey Mitchell
Director
Alaska DOL&WD, OSH

5/10/2012
Date



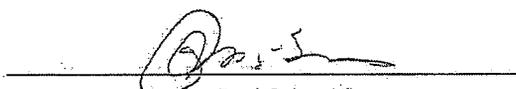
Joe Misenti
VP Human Resources
Trident Seafoods Corporation

5/10/2012
Date



Dan Taylor
Director of Health & Safety
Trident Seafoods Corporation

5/8/2012
Date



Paul Schneider
Shoreside Operations Safety Manager
Trident Seafoods Corporation

5/8/2012
Date