

# Canada Alcohol and Drug Standard: Requirements for Contractors

Type: Standard	Scope: Canada	Code: PEO-STD-CBU-002
Owner: People & Organization - Canada	Revision Date: 26 May 2021	Revision: 1.0
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## Objective

Repsol is committed to protecting the health and safety of all individuals affected by our activities, as well as the communities in which we live and operate. Repsol recognizes that the use of Alcohol or Drugs can have serious adverse effects on the safety and well-being of Contractors, Contract Workers, employees, personnel, the public and the environment. Awareness of the potential risks associated with the use of Alcohol and Drugs can assist in providing a safe, healthy and reliable workplace.

This Standard outlines the standards required by Repsol of its Contractors in relation to Contractor's Alcohol and Drug programs, policies and practices. Repsol requires its Contractors to ensure that all Contract Workers have the ability to perform their duties without any limitations relating to Alcohol or Drug use and at all times are Fit for Work.

The Standard supports Repsol's Global *Health, Safety and Environment Policy* and is one element of Repsol's overall system for mitigating risk and ensuring the safety of all personnel.

## Scope of application

This Standard applies to all Repsol Contractors and Contract Workers attending at, or conducting work on, Repsol premises and worksites in Canada.



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### 1. DEFINITIONS

- **Alcohol:** Any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume.
- **Alcohol and Drug Work Rule:** The Alcohol and Drug Work Rule as set out in the COAA Model and as modified for Work on Safety-Sensitive Locations or safety-sensitive projects pursuant to Section 4.1.
- **Cannabis:** Cannabis in any form including any synthetics or derivatives.
- **COAA Model:** Has the meaning given at Section 3.
- **Contract:** The contract, purchase order or other authorization for Work entered into between the Contractor and Repsol.
- **Contractor:** Any legal entity that the Company has contracted (including verbally) to perform Work or to act as its representative. Such entity may be, but is not limited to a corporation, unincorporated organization, partnership, sole proprietorship, joint venture, association, firm or trust. Any reference to Contractor shall include any workers, personnel, agents or subcontractors employed or engaged by Contractor, directly or indirectly, to perform Work and shall also include persons who are the assigns and successors of Contractor and its affiliates, in addition to any invitees of Contractor.
- **Contract Worker:** Any person performing Work for or on behalf of Repsol including all personnel, workers, subcontractors and agents employed or retained by the Contractor.
- **Drug(s):** Any drug, substance, chemical or agent the use or possession of which is unlawful in Canada or requires a personal prescription from a licensed treating physician or pharmacist, or any other psychoactive substance, and any non-prescription medication lawfully sold in Canada and shall include Cannabis, Drug Paraphernalia, and Medical Cannabis.
- **Drug Paraphernalia:** Any personal property which is associated with the use of any Drug, substance, chemical or agent the possession of which is unlawful in Canada and includes any item, product, device or equipment

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which is intended to be used as a masking agent or to otherwise tamper with, interfere with, adulterate or substitute any sample for an Alcohol and Drug test.

- **Fit for Work/Fitness for Work:** The condition or state in which a Contractor or Contract Worker is able to safely and acceptably perform duties without any limitations due to the use (or after-effects) of Alcohol or Drugs and being in compliance at all times with the Alcohol and Drug Work Rule.
- **Medical Cannabis Regulations:** Means Part 14, *Access to Cannabis for Medical Purposes*, of the *Cannabis Regulations* (SOR/2018-144) (Canada), as replaced or amended.
- **Medical Cannabis:** Cannabis that is authorized for use in accordance with the Medical Cannabis Regulations containing THC (tetrahydrocannabinol) or cannabinoids.
- **Negative Test Result:** A test result with an Alcohol or Drug level or concentration level below that as set out in the Alcohol and Drug Work Rule.
- **Office Locations:** Includes the following locations of Repsol:
  - Calgary main office: Bankers Hall West, 888 3 St SW, Calgary AB T2P 5C5;
  - Edson Office: P.O. Box 6840, 4937 1st Ave, Edson AB T7E 1V2; and
  - Chauvin Office: P.O. Box 99, 238 Terminal Road, Chauvin AB T0B 0V0.
- **Positive Test Result:** An Alcohol or Drug test result with a level or concentration equal to or in excess of that set out in the Alcohol and Drug Work Rule.
- **Standard:** *Canada Alcohol and Drug Standard: Requirements for Contractors*, as amended.
- **Reasonable Grounds:** Includes information established by the direct observation of the Contractor or Contract Worker's conduct or other indicators, such as the physical appearance of the Contractor or Contract Worker, the smell associated with the use of Alcohol or Drugs on his or her person or in the vicinity of his or her person, his or her attendance record, circumstances surrounding an incident or near miss and the presence of Alcohol, Drugs or Drug Paraphernalia in the vicinity of the Contractor or Contract Worker or the area where the Contractor or Contract Worker worked.

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- **Repsol or Company:** Repsol Oil & Gas Canada Inc. and its subsidiaries, affiliates and partnerships.
- **Repsol Facility Alcohol and Drug Search Plan:** Means the *Repsol Facility Alcohol and Drug Search Plan*, as amended, available at: [http://repsolnet/pubs/en/Resources/Binarios/Doc/RepsolAlcoholandDrugSearchPlanforRepsolFacilities\\_tcm19-86196.pdf](http://repsolnet/pubs/en/Resources/Binarios/Doc/RepsolAlcoholandDrugSearchPlanforRepsolFacilities_tcm19-86196.pdf)
- **Safety-Sensitive Location:** Any location other than Office Locations where oil and gas related activities are performed at a Worksite; including, but not limited to: construction, drilling, completions, operations, remediation & reclamation and seismic work.
- **Safety-Sensitive Position:** A position that, if not performed in a safe manner, can cause direct and significant damage to property and/or injury to the employee, others around them, the public and/or the immediate environment. For purposes of this Standard, it shall also include workers who operate a motor vehicle on behalf of the Company in the performance of their job duties.
- **Substance Abuse Assessment:** As provided for pursuant to COAA Model, “Appendix B, Substance Abuse Expert”, as amended.
- **Supervisor:** The individual accountable for a particular area or shift, including but not limited to; managers, foreman, general foreman, superintendent, team leader, and any others in supervisory positions that direct work of others or are directly responsible for the Work or performance of Contractors or Contract Workers.
- **Work:** All the work that Contractor is required to carry out in accordance with the terms of the Contract, including services and the provision, delivery, use, inspection, repair, storage and transport of all goods and equipment, at, on, under, above, in or through a Worksite. For further certainty, this excludes the providers and suppliers of goods and equipment who do not enter a Worksite.
- **Worksite:** All real property, lands, waters and other places at, on, under, in or through which the Work is to be performed including, but not limited to; buildings, offices, Office Locations, facilities, worksites, camps, containers, vessels, boats, vehicles, aircrafts, workshops and places whether owned, occupied, leased or controlled by Repsol. This includes any work location to which Contractors or Contract Workers have been assigned including any offsite worksite or location.

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## 2. COAA MODEL

Pursuant to compliance with this Standard, Repsol requires all Contractors to **meet or exceed** the requirements and standards for alcohol and drug programs policies and practices including: (i) alcohol and drug prevention; and (ii) alcohol and drug testing protocols and programs, pursuant to the following industry practice:

- a. The Construction Owners Association of Alberta (COAA): *Canadian Model for Providing a Safe Workplace, Alcohol and Drug Guidelines and Work Rule Version 6.0 Effective July 1, 2018*, as amended:

<https://www.coaa.ab.ca/COAA-Library/SAF-CDM-CBP-01-2018-v6%20Canadian%20Model.pdf>;

AND

- b. The Construction Owners Association of Alberta (COAA): *Canadian Model Requirements - Information Bulletin: Selecting and Instructing Sample Collection and Laboratory Service Providers, Version 1.0, April 2016*, as amended:

<https://www.coaa.ab.ca/COAA-Library/SAF-CDM-PRC-00-2014-v1%20Canadian%20Model%20Requirements%20-%20information%20bulletin.pdf>

(together, the “**COAA Model**”).

In the event of a discrepancy or conflict between the COAA Model and the Standard, the Standard governs.

Failure to have and administer alcohol and drug policies, testing and programs in accordance with this Standard constitutes a breach of this Standard.

Contractors should obtain independent legal advice when creating and enforcing their alcohol and drug program and policies. This Standard does not in any way constitute legal advice.

Any reference to an obligation of Contractor in this Standard shall be deemed to be an obligation on both the Contractor and its Contract Workers.

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### 3. ADDITIONAL REPSOL REQUIREMENTS ABOVE COAA MODEL

The following additional requirements (in addition to the COAA Model) must be adhered to for all Worksites. Contractors must ensure Contract Workers are trained on these requirements prior to commencing Work.

#### 3.1 More stringent Alcohol and Drug Work Rule for Safety-Sensitive Locations or Safety-Sensitive Projects

- (a) For all Work on: (i) Safety-Sensitive Locations; or (ii) safety-sensitive projects pursuant to Section 5.2, a Positive Test Result for Alcohol constitutes:
- (i) at or above 0.020 grams per 210 litres of breath; or
  - (ii) at or above 0.020 grams per 100 millilitres of saliva.

#### 3.2 Drug Paraphernalia

- (a) Drug Paraphernalia is banned from all Worksites.

#### 3.3 No alcohol in vehicles at Safety-Sensitive Locations

- (a) Alcohol shall not be permitted to be kept or stored in any vehicle (including the trunk of vehicle) at a Safety-Sensitive Location.

#### 3.4 Medical Cannabis

- (a) Contractors must have a Medical Cannabis policy in effect regarding reporting, managing, and assessing Fitness for Work in relation thereto, and shall ensure any Contractor Worker using Medical Cannabis is removed from duty until the Fit for Work assessment is completed. The Contractor shall not permit the Contract Worker to return to Work until the Contractor has confirmed the Contract Worker is Fit for Work.



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**3.5 Cannabis Prohibition at Company Premises**

- (a) Contractors must ensure Contract Workers do not use, possess, cultivate, manufacture, store, distribute or offer for sale Cannabis while on Company Premises. Contractors must also ensure Contract Workers remain Fit for Work at all times while on Company Premises.

**3.6 Alcohol and Drug Impaired Driving Charges**

Contractors must obligate Contractor Workers who operate a motor vehicle or equipment at a Worksite to immediately report to his/her Supervisor any of the following incidents:

- (a) any impaired or drug driving charge;
- (b) a loss of license (temporary or otherwise) as a result of any impaired or drug driving charge or administrative license suspension; and
- (c) a loss of license due to an impaired or drug driving conviction or plea of guilty to such charge.

The Contractor shall ensure the Contract Worker is removed from any Work which requires driving (vehicles or equipment) until its investigation is completed. The Contractor shall not permit the Contract Worker to return to Work until the Contractor has confirmed the Contract Worker is: (i) Fit for Work; and (ii) legally authorized to operate a vehicle or equipment.

**4. ALCOHOL AND DRUG TESTING**

The Contractor must utilize COAA Model testing methods (COAA Model, *Appendix A, Alcohol and Drug Testing Procedures*) for all Alcohol and Drugs testing.

The Contractor shall, in addition to the requirements below, include in its Alcohol and Drug Program post-incident and near-miss testing and reasonable cause/grounds testing pursuant to Section 4.0 of the COAA Model.

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### 4.1 Site-Access Testing for Safety-Sensitive Locations

Repsol requires Contractors to ensure Contract Workers in Safety-Sensitive Positions meet one of the following conditions for site-access:

The Contract Worker has:

- (1) a Negative Test Result from a pre-employment/pre-assignment test (in accordance with the COAA Model) with the same Contractor to which they are currently employed;

**OR**

- (2) a Negative Test Result from a pre-access/site-access test (in accordance with the COAA Model) within 90 days on or before commencing Work at a Repsol Worksite.

A Contract Worker in a Safety-Sensitive Position **will not** be required to complete a site-access test in the following circumstances:

- (a) The Contractor Worker has been in continuous employment with the same Contractor since receiving a Negative Test Result pursuant to a pre-assignment/pre-employment Alcohol and Drug test; or
- (b) The Contract Worker received a Negative Test Result in accordance with the COAA Model at any other work site within 90 days on or before commencing Work at the Repsol Worksite.

### 4.2 Safety-Sensitive Projects Testing

Repsol may require pre-assignment Alcohol and Drug testing prior to the commencement of Work on a safety-sensitive project, as determined by Repsol. In this circumstance, all Contract Workers to be dispatched to the safety-sensitive project must have a Negative Test Result within 10 days unless extended at the discretion of a Director of the appropriate function or operational group directing the project at Repsol, immediately prior to the commencement of the Work.

### 4.3 Exemptions from Testing

A site access test is not required for temporary/day-by-day visitors to Safety-Sensitive Locations if:

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- (i) The individual is escorted at all times by Repsol personnel or other personnel designated by Repsol; and
- (ii) They are not performing any Work.

These individuals may include personnel from other sites, vendor representatives, visitors, government agents, regulatory authorities and those authorized by Repsol to attend for the purpose of tours or school groups.

#### 4.4 Random Testing

At this time, Repsol does not participate in or utilize random testing.

### 5. REQUIREMENTS OF CONTRACTORS

Contractors are required to read, understand and enforce this Standard for all Contractors and Contract Workers who conduct any Work for or on behalf of Repsol. Contractors must provide adequate and regular training to Contract Workers on the Standard and their own alcohol and drug programs and policies.

Contractors shall compel Contract Workers to:

- (i) Read and understand the Standard, including the Repsol Alcohol and Drug Search Plan for Repsol Facilities;
- (ii) Comply with the terms of this Standard; and
- (iii) Participate in regular training on the Contractor's alcohol and drug program and this Standard.

### 6. REQUIREMENTS OF REPSOL SUPERVISORS AND REPSOL EMPLOYEES

Repsol employees (including Repsol Supervisors) are required to ensure they read and understand this Standard, including the *Repsol Facility Alcohol and Drug Search Plan* and must enforce the Standard for all Contractors.

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Any breach or suspected breach of the Standard, including any situation in which there are Reasonable Grounds to believe a Contractor or Contract Worker is not Fit for Work or not in compliance with the Alcohol and Drug Work Rule, must be immediately reported to a Contractor Supervisor and Repsol, and handled pursuant to this Standard.

## 7. FIT FOR WORK AND ALCOHOL AND DRUG WORK RULE

Contractors must ensure that Contractors and Contract Workers are at all times Fit for Work while performing any Work.

**Under no circumstances may a Contractor or Contract Worker commence, continue or return to Work if they are not Fit for Work. Pending an investigation or Fit for Work assessment, the Contract Worker must be removed from duty.**

## 8. RIGHT TO AUDIT

Repsol has the right to audit its Contractors to ensure compliance with this Standard:

- (a) During the course of the Work, and the greater length of time, either:
  - (i) forty-eight (48) months after the expiry or earlier termination of the Contract;
  - or
  - (ii) as provided in the Contract.

Repsol, or its duly authorized representatives, have the right to audit the Contractor's alcohol and drug program, practices and policies for the purposes of ensuring compliance with this Standard.

- (a) The audit may occur at any reasonable time and may involve taking copies of Contractor's records (including data stored on computers), books, personnel records (with individual's names redacted), accounts, correspondence, memoranda, receipts, vouchers and other papers of any kind relating to verification of any provision of this Standard, the Contract, the Contractor's policies or Standards in relation to its alcohol and drug program and testing, including, but not limited to the following:
  - (i) Results of alcohol and drug testing with individual's names redacted;



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- (ii) Assessments or audits of the Contractor’s alcohol and drug program; and
  - (iii) Worksite spot-checks/field visits.
- (b) The Contractor must cooperate fully with Repsol or its representatives in carrying out of any audits. Repsol will conduct its audits in a reasonable manner.
  - (c) The Contractor is required to keep all records referenced above and any documentation related to this Standard and the Contract for a period of six (6) years after the date of completion of the Work or as required by applicable laws, whichever is greater. The Contractor shall make those records available to Repsol upon request.

Upon entering into a Contract with Repsol, Contractors will be required to verify their compliance with Repsol’s Alcohol and Drug verification tools including an Alcohol and Drug Contractor Questionnaire (See Appendix A of this Standard). Contractors that are members of ISNetworld® will be required to comply with ISNetworld® ISN® RAVS® Safety Program Compliance including the Drug & Alcohol RAVS Written Program protocol.

**9. VIOLATIONS/BREACH OF STANDARD AND INVESTIGATIONS**

**9.1 Investigation Required if Violations of Standard**

The Contractor shall conduct an investigation if there is violation or possible violation of the Standard and address the violation in compliance with its drug and alcohol program and this Standard.

Repsol may also conduct its own investigation and the Contractor shall reasonably cooperate with such investigation.

At any time, if Repsol reasonably believes the Standard has been violated, Repsol can require the Contractor commence an investigation. Repsol may also require Alcohol and Drug testing of Contractors or Contract Workers in a post-incident or near-miss situation as part of a complete incident investigation undertaken by either Repsol or the Contractor. Repsol will only require confirmation of the test result to confirm whether the Contractor Worker received a Positive Test Result or Negative Test Result.

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### 9.2 Breaches of Standard - Reporting

If at any time there is a breach of this Standard, the Contractor must report to Repsol by emailing their Worksite representative at Repsol.

Any breach of this Standard shall be considered a breach of Contract and may result in Repsol exercising its rights under the Contract, which may include the suspension or termination of the Contract.

### 9.3 Removal and Ban from Worksite if Contract Worker not Fit for Work

Pending any investigation or a Fit for Work assessment (including on the basis of Reasonable Grounds or post-incident/near-miss), the Contract Worker must be immediately removed from duty.

If a Contractor Worker is found or identified post-investigation to not have adhered to the Alcohol and Drug Work Rule or Sections 4.1 and 4.2 of this Standard, then the Contract Worker shall be immediately banned from all Worksites and Repsol must be promptly notified in writing pursuant to Section 10.2.

If such Contract Worker should return to a Worksite (to work for the same Contractor) this shall be considered a breach of this Standard.

Following the removal and ban of the Contractor Worker, Repsol, in its sole discretion, may consider a Contract Worker's return to a Worksite, subject to specific conditions being met, to be determined on an individual and case-by-case basis, and confirmed in writing.

The Contractor must accommodate the Contract Worker for any potential disability pursuant to applicable laws.

### 9.4 Reporting Breaches/Suspected Breaches of Standard for other Contractors

Anyone wishing to report (anonymously or otherwise) violations of this Standard or concerns regarding a Contractor's alcohol and drug programs, policies or testing, is encouraged to do so by contacting the Repsol Ethics Point call center, available 24 hours a day, 7 days a week at the phone number for Canada available at 1-855-846-6577.

**In the event of any immediate risk to the health and safety of people, the environment, or property, the Contractor must contact local emergency services and immediately report to all government authorities pursuant to applicable laws.**

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## 9.5 Approved and Accredited Laboratories

All Alcohol and Drug testing, including mobile collection services, must be sent to an accredited laboratory that holds a certificate issued by the Substance Abuse and Mental Health Services Administration (SAMHSA) of the United States Department of Health and Human Services under the National Laboratory Certification Program.

Contractors shall have an agreement for services in place with an accredited laboratory.

## 10. SEARCHES: UNANNOUNCED SEARCHES

Repsol may conduct unannounced searches (with or without sniffer dogs) for Alcohol, Drugs or Drug Paraphernalia at Safety-Sensitive Locations in order to ensure a safe and secure environment for all personnel pursuant to the *Repsol Facility Alcohol and Drug Search Plan*.

## 11. AMENDMENTS

Repsol may amend this Standard from time to time. The Contractor shall adhere to the most updated version of the Standard and ensure same for its Contract Workers.

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### Approval

See below

### Validity

This Standard is effective immediately as of date of signature

### Revoked regulations

None

### Revision history

	Date	Reason for Change
00		First issue.

### Revision 1.0 approved by:

Approval:



Tanya Cake, Manager BP & Talent Management Canada  
05/01/2021

**People & Organization – Canada**

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### Appendix A - Alcohol and Drug Contractor Questionnaire (note “Enform” is now “Energy Safety Canada”)

Drug and Alcohol Policy (Oil and Gas)			
No.	Resources	Question	Additional Guidance
1	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address the Drug and Alcohol Policy is endorsed by Senior Management?	The Drug and Alcohol Policy should be endorsed by Senior Management. Please ensure the policy uploaded is signed and dated by the senior person in your organization. If uploading a signed policy is not practicable, please include a statement in your company's program that indicates the policy has been (or will be) signed by Senior Management.
2	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address roles and/or responsibilities of employees involved in your company's Drug and Alcohol program?	Employees should be accountable and be aware of their role as it relates to the drug and alcohol policy. Supervisors should have clear roles and responsibilities set out to manage the risks associated with drug and alcohol use. The roles and responsibilities should cover all levels of management, administration, and field operations.
3	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address supervisors are provided training on recognition of impairment and appropriate response procedures?	The employer should train and educate supervisors to be able to recognize impairment in the workplace, as well as how to properly deal with an impairment situation. This includes recognizing the signs and symptoms of impairment and the procedures to follow when an employee is suspected of being impaired or having a substance abuse problem.
4	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address the identification of safety-sensitive positions and/or safety-sensitive job sites?	The employer should have a method to determine and define a safety-sensitive position. This could be through a risk matrix or clearly defined and communicated text. A safety-sensitive task is defined by the company's work rules but must be consistent with industry standards.
5	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address employees performing safety-sensitive job tasks and/or job tasks at a site designated as requiring Site Access testing will be tested for the use of drugs and/or alcohol?	The employer shall clearly define situations when an employee may be subject to drug and alcohol testing. This may include, but is not limited to, pre-access testing, post incident testing, reasonable suspicion testing, and periodic/scheduled testing. Pre-Access testing may be required by the contractor company's hiring clients.
6	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address alcohol testing complies with recognized industry standards (Enform Alcohol and Drug Policy Model and/or the COAA Model for Providing a Safe Workplace)?	Alcohol testing levels must be consistent with the standards referenced in the Enform Alcohol and Drug Policy Model, the COAA Canadian Model for Providing a Safe Workplace, and/or US DOT, HHS, or SAMHSA. The employer shall ensure that these standards are communicated to all levels of the company.
7	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address drug testing includes both screening and confirmation tests consistent with recognized industry standards (Enform Alcohol and Drug Policy Model, COAA Model for Providing a Safe Workplace, US DOT, HHS, or SAMHSA)?	Drug testing must include drug concentration limits consistent with the Enform Alcohol and Drug Policy Model, the COAA Canadian Model for Providing a Safe Workplace, and/or US DOT, HHS, or SAMHSA. The individuals performing sample collections must be appropriately qualified. A SAMHSA-certified laboratory must be used for confirmation testing. The employer shall ensure that these standards are communicated to all levels of the company.
8	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address that testing is conducted if there is reasonable suspicion to believe an employee is under the influence?	Your company's Drug and Alcohol policy should outline the steps to be taken when an employee is found or suspected to be under the influence. Testing may be conducted when an individual reports to work in an unfit condition, and there are reasonable grounds to suspect substance abuse.
9	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address that post incident testing is required following an incident or near miss?	The employer should have a method to determine if post incident testing is warranted following an incident or near miss, including how the decision to test is determined. Situations that warrant testing include a significant incident, near miss, or report of dangerous behaviour. Post-incident testing should be conducted as soon as reasonably practicable.
10	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address that an employee may request help to treat an addiction?	The Drug and Alcohol policy should clearly communicate that assistance is available for employees who struggle with addiction. An employer shall outline when self-help can be requested, the resources available, the employee's responsibilities, and rules for discipline. Contact information for assistance programs should be provided and other self-help resources including references to Employee Assistance Programs or Government sponsored Addiction & Substance Abuse program.
11	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address employees will be accommodated if an addiction problem exists?	A procedure for assessing an employee for drug and/or alcohol addiction shall be in place to assist. Treatment programs should be available through employee and family assistance programs (i.e. Employee Assistance Programs or EAPs). Procedures should be in place to allow time for treatment as well as for safe return to work.
12	Enform Alcohol and Drug Policy Model COAA Canadian Model for Providing a Safe Workplace	Does the program address drug and alcohol testing records must be kept confidential?	Employers must have a system to protect private, personal information about its employees. Records of drug and alcohol testing should be considered strictly confidential. These records should be kept in a locked file and be accessible only to designated persons.