



## **Environment, Health and Safety Requirements for Mode 1 Contractor**

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Suncor Owning Group: Environment, Health & Safety

Controlled Document  
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## 1 About this document

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### Purpose

This document provides the Environment, Health & Safety (EH&S) and regulatory requirements a Contractor must comply with.

Section 2 of this document provides the mandatory EH&S requirements a Contractor must meet in order to work with Suncor.

Section 3 of this document provides the specific requirements that must be included in the Contract EH&S Plan.

**Notwithstanding anything in this document to the contrary, nothing in this documents amends or in any way modifies the allocations of risks and liabilities set forth in the applicable contract governing the Scope of Work (SOW).**

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### Scope

This document is part of Suncor's Element 10 Contractor Management.

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### Target Audience

This document applies to Contractors performing Mode 1 Hands-On Work at Suncor Energy Inc. and subsidiaries over which Suncor has operational control.

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## 2 EH&S Requirements

The following EH&S requirements are mandatory and must be met by the Contractor.

### 2.1 Contract EH&S Plan

#### Contract EH&S Plan

- 2.1.1 The Contractor must develop and submit a Contract EH&S Plan for the SOW, in accordance with section 3 of this document.
- 2.1.2 Upon award, the Contractor must finalize the Contract EH&S Plan in consultation with Suncor.
- 2.1.3 The Contractor must participate in a pre-mobilization meeting with Suncor and acknowledge acceptance of the approved Contract EH&S Plan prior to executing on-site Hands-On Work.
- 2.1.4 The Contractor must obtain approval from Suncor for any changes to the approved Contract EH&S Plan.
- 2.1.5 Suncor may audit any portion of the approved Contract EH&S Plan throughout the duration of the work.
- 2.1.6 The Contractor and Contract Workers are accountable for executing the SOW while adhering to the approved Contract EH&S Plan.

### 2.2 Hazard Management

#### Hazard Management

- 2.2.1 The Contractor must comply with all hazard controls identified by Suncor.
- 2.2.2 The Contractor must comply with Suncor's hazard management processes and programs including:
  - i. applicable business unit field assessment tools (for example, field level hazard assessment (FLHA), field level risk assessment (FLRA) or job hazard analysis (JHA)); and
  - ii. applicable business unit field observation program (for example, workplace observation, safety observation, or focus observation programs); and
  - iii. safety meetings and toolbox talks.
- 2.2.3 The Contractor must comply with Suncor's *Life Saving Rules*.
- 2.2.4 The Contractor must comply with *CO-S22 Contractor Alcohol and Drug Standard*.
- 2.2.5 Contract Workers must wear the appropriate personal protective equipment (PPE) as detailed in Suncor's business unit governing document(s).

- 2.2.6 All hazardous products must be approved by Suncor prior to use at the Work Site. The Contractor must submit safety data sheet (SDS) information before hazardous products are transported.

### **2.3 Management of Change**

#### **Management of Change**

- 2.3.1 The Contractor must comply with Suncor's *SUN-00097 Standard for Management of Change* and the applicable business unit site-specific management of change governing document.

### **2.4 Emergency Management**

#### **Emergency Management**

- 2.4.1 The Contractor must comply with Suncor's business unit site-specific Emergency Response Plan (ERP).

### **2.5 Learning and Competency**

#### **Learning and Competency**

- 2.5.1 The Contractor must ensure Contract Workers meet the mandatory training requirements to execute the SOW.
- 2.5.2 The Contractor must maintain all training and certification records of the Contract Workers and provide this documentation to Suncor upon request.

### **2.6 Regulatory Compliance**

#### **Regulatory Compliance**

- 2.6.1 The Contractor must resource its organization to ensure compliance with all regulatory requirements, including all federal, state, provincial and municipal statutes, regulations, by-laws and associated standards, procedures, guides, codes and best practices for the SOW.
- 2.6.2 The Contractor must ensure equipment and materials being used or installed on a Suncor Work Site meets applicable regulatory requirements.
- 2.6.3 The Contractor must immediately notify Suncor of any event that may require regulatory reporting. Suncor is the Prime Contractor and will report to the applicable regulator as required.
- 2.6.4 The Contractor must obtain Suncor's approval for non-regulatory external communications.

### **2.7 Incident and Corrective Action Management**

#### **Incident and Corrective Action Management**

- 2.7.1 The Contractor must comply with Suncor's *SUN-00010 Incident Management Standard* and Suncor's *SUN-00189 Corrective Action Standard*, including:
- i. immediate reporting of any incident to Suncor;
  - ii. participation in incident investigations; and



iii. implementation of corrective actions as directed by Suncor.

2.7.2 The Contractor must comply with Suncor's *SUN-00217 Injury and Illness Classification Document*.

## **2.8 EH&S Reporting**

### **EH&S Reporting**

2.8.1 Upon award, the Contractor and Suncor will confirm the required EH&S statistics the Contractor must provide throughout the execution of the SOW.

### 3 Contract EH&S Plan Overview and Requirements

**Contract EH&S Plan Overview**

Suncor will determine the overall consequence ranking based on the hazards identified for the specific SOW. This ranking is documented within the Hazard Identification Checklist. The assigned consequence ranking determines the minimum required content (sections) for the Contract EH&S Plan.

The Contract EH&S Plan must include the sections indicated as “Required” in the following table. For any SOW, there are two levels of consequence ranking: low (C1 - C4) and high (C5 - C6).

Section #	Contract EH&S Plan Requirements	C1 - C4	C5 - C6
3.1	Scope of Work	Required	Required
3.2	Health & Safety Management	Required	Required
3.3	Environmental Management	Required	Required
3.4	Learning and Competency	Required	Required
3.5	Sub-Contractor Management	Required	Required
3.6	Leadership Accountability	Not Required	Required
3.7	Audits and Assessments	Not Required	Required

Regardless of the consequence ranking, Suncor expects the Contractor to have processes and systems in place to meet all regulatory, environment, health and safety legal requirements.

**Contract EH&S Plan Format**

The Contract EH&S Plan must be scope-specific and must follow the same format and sequence as indicated in sections 3.1 – 3.7 of this document, including section numbering and content.

	<b>3.1</b>	<b>Scope of Work</b>
<b>Scope of Work</b>	3.1.1	The Contractor must include details of the work covered by the Contract EH&S Plan.
	<b>3.2</b>	<b>Health &amp; Safety Management</b>
<b>Hazard Assessment</b>	3.2.1	The Contractor must review Suncor’s Hazard Identification Checklist and identify any additional health and safety hazards as required.
	3.2.2	The Contractor must provide a scope-specific assessment that expands on the health and safety hazards (as defined in the Hazard Identification Checklist) and will include: <ul style="list-style-type: none"> <li>i. the tasks to be performed;</li> <li>ii. identification of the health and safety hazards;</li> <li>iii. risks prior to the application of controls;</li> <li>iv. identification of controls to mitigate the health and safety hazards; and</li> <li>v. residual risk after the control has been applied.</li> </ul>
<b>Life Saving Rules</b>	3.2.3	The Contractor must indicate how Suncor’s <i>Life Saving Rules</i> will be communicated to Contract Workers, including how the Contractor will verify compliance. This may be communicated during site orientation, through toolbox talks and/or safety meetings on an ongoing basis.
<b>Fit for Duty</b>	3.2.4	The Contractor must indicate how the health and welfare of the Contract Workers will be ensured, including: <ul style="list-style-type: none"> <li>i. indicating who the service provider is for post-incident and reasonable cause alcohol and drug testing;</li> <li>ii. providing an understanding of what controls are in place for prescription medication in the workplace;</li> <li>iii. determining health and wellness requirements to perform scope of work (for example, medical assessments, audiometric and vision testing); and</li> <li>iv. requirements to ensure PPE, such as respirators or fall protection, are properly fit tested, used and maintained.</li> </ul>
	<b>3.3</b>	<b>Environmental Management</b>
<b>Environmental Management</b>	3.3.1	The Contractor must review Suncor’s <i>Hazard Identification Checklist</i> and identify any additional environmental factors or hazards relevant to the SOW.
	3.3.2	The Contractor must identify controls to manage the environmental hazards.



- Learning and Competency**
- 3.4 Learning and Competency**
- 3.4.1 The Contractor must provide a training matrix that includes the Suncor mandatory training as well as specific SOW training requirements.
  - 3.4.2 The Contractor must indicate how competency of Contract Workers to execute the SOW will be ensured.

**Note:** Upon award, the Contractor must work with Suncor to update the training matrix to ensure mandatory Suncor training requirements are defined.

- Sub-Contractor Management**
- 3.5 Sub-Contractor Management**
- 3.5.1 If the Contractor is using sub-contractors to perform any portion of the SOW, the Contractor must:
    - i. provide the names of the sub-contractor(s);
    - ii. define the specific scope the sub-contractor(s) will be executing; and
    - iii. describe how sub-contractor(s) will be held accountable to meet the EH&S requirements within the approved Contract EH&S Plan.

- Leadership Accountability**
- 3.6 Leadership Accountability**
- 3.6.1 The Contractor must provide a summary of the expectations and frequency Contractor leaders engage in the following:
    - i. safety discussions (for example, toolbox talks, safety meetings);
    - ii. investigation of incidents;
    - iii. workplace observation systems; and
    - iv. work site EH&S inspections and safety steering committees.

- Audits and Assessments**
- 3.7 Audits and Assessments**
- 3.7.1 The Contractor must provide a summary of the audit and assessment activities for monitoring EH&S performance against the Contract EH&S Plan that includes:
    - i. a schedule or frequency of self-assessments and/or audits; and
    - ii. a process for tracking and managing corrective actions.



## 4 Terms and Definitions

Term	Definition
<b>Contract Worker</b>	Any individual contracted workforce worker that is employed by the Contractor including sub-contractor personnel engaged in executing the SOW.
<b>Contractor</b>	Any entity that provides services, including, but not limited to vendors and consultants.
<b>Contract EH&amp;S Plan</b>	The SOW-specific EH&S plan developed by the Contractor that is written in accordance with this document.
<b>Hands-On Work</b>	Any work activity performed at a work site controlled or operated by Suncor, including, but not limited to plants, refineries, oil rigs, docks or piers, pipelines, mines, and facilities. Hands-on work involves operations, maintenance, or construction activities such as (but not limited to) operating equipment, using tools or working at height, and the supervision of such work.
<b>Hazard Identification Checklist</b>	A tool that provides an inventory of hazards that can be reasonably identified by Suncor. This list is not all-encompassing and may need to be supplemented by the Contractor.
<b>Mode 1 Contractor</b>	Applicable where the Contractor provides people, processes and/or equipment for the execution of the Scope of Work under the oversight, instructions and EH&S Management System (MS) of Suncor. The Contractor has a management system to provide assurance that the Contract Worker(s), including sub-contractors, are qualified and fit for the work and that the processes, tools, materials and equipment they provided by the Contractor are properly maintained and suitable for the Scope of Work. The Contractor reports EH&S performance data, and incidents to Suncor.
<b>Scope of Work (SOW)</b>	The materials and/or services to be supplied or anticipated to be supplied, including all requirements & obligations of both Suncor and the Contractor as set out in the contract.
<b>Work Site</b>	A location where a worker is, or is likely to be, engaged in any occupation.