



Environment, Health and Safety Requirements for Mode 2 Contractors

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Suncor Owning Group: Environment, Health & Safety

Controlled Document
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About this document

Purpose

This document provides the following for Mode 2 Contractors:

- mandatory EH&S requirements including the requirement to develop a Contract EH&S Plan; and
- specific requirements that must be included within the Contract EH&S Plan.

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

Scope

This document is part of Element 10 Contractor Management.

Target Audience

This document applies to Contractors performing Mode 2 Hands-On Work on Work Sites operated by Suncor Energy Inc. or its affiliates.

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 will develop and submit a Contract EH&S Plan for the SOW, in accordance with section 3 of this document.
- 2.1.2 Prior to starting Hands-On Work, 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 starting 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 as identified within the approved Contract EH&S Plan. .
- 2.2.2 The contractor must comply with Suncor's *Life Saving Rules*.
- 2.2.3 The contractor must comply with *CO-S22 Contractor Alcohol and Drug Standard*.
- 2.2.4 Contract workers must wear the appropriate personal protective equipment (PPE) as detailed in Suncor's business unit governing document(s).
- 2.2.5 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 Learning and Competency

Learning and Competency

- 2.3.1 The contractor must ensure contract workers meet the mandatory training requirements to execute the SOW.
- 2.3.2 The contractor must maintain all training and certification records of the contract workers and must provide this documentation to Suncor upon request.

2.4 Regulatory Compliance

Regulatory Compliance

- 2.4.1 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.
- 2.4.2 The contractor must ensure equipment and materials being used or installed on a Suncor Work Site meets applicable regulatory requirements.
- 2.4.3 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.
- 2.4.4 The contractor must obtain Suncor's approval for non-regulatory external communications.

2.5 EH&S Reporting

EH&S Reporting

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

3.0 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	Emergency Management	Required	Required
3.6	Sub-Contractor Management	Required	Required
3.7	Leadership Accountability	Required	Required
3.8	Regulatory Compliance	Required	Required
3.9	Management of Change	Not Required	Required
3.10	EH&S Governing Documents	Not Required	Required
3.11	Incident and Corrective Action Management	Not Required	Required
3.12	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 – 3.12 of this document, including section numbering and content.

	3.1	Scope of Work
Scope of Work	3.1.1	The contractor must include details of the work covered by the Contract EH&S Plan.
	3.2	Health & Safety Management
Hazard Assessment	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"> i. the tasks to be performed; ii. identification of the health and safety hazards; iii. risks prior to the application of controls; iv. identification of controls to mitigate the health and safety hazards; and v. residual risk after the control has been applied.
	3.2.3	The contractor must provide examples of the following tools or of equivalent tools used for the SOW: <ul style="list-style-type: none"> i. field assessment tool(s) for example, field level hazard assessment (FLHA), field level risk assessment (FLRA) or job hazard analysis (JHA); and ii. observation program(s) (for example, workplace observation, safety observation, or focus observation programs).
Life Saving Rules	3.2.4	The contractor must indicate how Suncor's Life Saving Rules 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.
Fit for Duty	3.2.5	The contractor must indicate how the health and welfare of the contract workers will be ensured, including: <ul style="list-style-type: none"> i. indicating who the service provider is for post-incident and reasonable cause alcohol and drug testing; ii. providing an understanding of what controls are in place for prescription medication in the workplace; iii. determining health and wellness requirements to perform scope of work (for example, medical assessments, audiometric and vision testing); and iv. requirements to ensure PPE, such as respirators or fall protection, are properly fit tested, used and maintained.

Environmental Management

3.3 Environmental Management

- 3.3.1 The contractor must review Suncor’s hazard identification checklist and identify any additional environmental factors or hazards relevant to the SOW.
- 3.3.2 The contractor must identify all controls required to manage the environmental hazards, including any Suncor identified environmental controls and any additional controls identified as required by the contractor.

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.
- 3.4.3 The contractor must indicate how the competency of supervision to perform 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.

Emergency Management

3.5 Emergency Management

- 3.5.1 The contractor must provide scope specific emergency response procedures based on applicable hazards, including any specialized emergency resources (people and equipment).
- 3.5.2 Once the contract is awarded, the contractor must work with Suncor to develop a scope specific Emergency Response Plan (ERP) that:
 - i. aligns with Suncor business unit-specific ERP;
 - ii. includes the contractor’s emergency response procedures;
 - iii. includes a schedule of drills and exercises, if applicable;
 - iv. includes roles and responsibilities and organization structure;
 - v. identifies the emergency response service provider; and
 - vi. identifies the communication process for activating the emergency response service provider.

Note: The contractor may be required to complete an Emergency Preparedness Plan (EPP) Template provided by the Suncor business unit area as part of contractor’s ERP.

3.6 Sub-Contractor Management

Sub-Contractor Management

- 3.6.1 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.

3.7 Leadership Accountability

Leadership Accountability

- 3.7.1 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.

EH&S Organization

- 3.7.2 The contractor must provide an organizational structure that includes:
- i. an organization chart depicting the relationship between EH&S workers, upper management and line management workers executing the SOW; and
 - ii. roles and responsibilities of the EH&S personnel in executing the SOW.

3.8 Regulatory Compliance

Regulatory Compliance

- 3.8.1 If Suncor has identified regulatory requirements and compliance tasks for the contractor to manage, the contractor must indicate how those requirements and risks associated with each compliance task will be managed, including:
- i. coordinating with Suncor for obtaining the required approvals and permits prior to starting work; and
 - ii. defining the process for completing compliance items.
- 3.8.2 The contractor must provide a process for external regulatory communication with Suncor, including:
- i. notification to Suncor of any event that may require regulatory reporting;
 - ii. responsibility to contact external regulator; and
 - iii. obtaining approval for non-regulatory external communication.

3.9 Management of Change

Management of Change

- 3.9.1 The contractor must provide a management of change process that indicates how changes to the SOW and the Contract EH&S Plan will be identified, reviewed, managed, approved and communicated.

3.10 EH&S Governing Documents

EH&S Governing Documents

- 3.10.1 The contractor must provide a list of EH&S documents that will be followed for the SOW.

Note: Suncor will provide a non-exhaustive list of the mandatory Suncor scope specific documents that must be followed, which Suncor may amend or add to at any time, and the contractor must identify these documents in the Contract EH&S Plan.

3.11 Incident and Corrective Action Management

Incident Management

- 3.11.1 The contractor must provide an incident management process that, at a minimum, includes:
- i. how the contractor will ensure immediate reporting to Suncor of any incident with or without a loss;
 - ii. how the contractor will ensure appropriate classification of occupational injuries and illnesses;
 - iii. the incident investigation process, including roles and responsibilities, and leadership involvement; and
 - iv. the process for identifying root causes.

Corrective Actions

- 3.11.2 The contractor must indicate how corrective actions from incidents, audits and assessments will be addressed, including:
- i. defining how risks associated with undesirable situations are reduced to an acceptable level;
 - ii. defining who is the responsible person to oversee corrective action scope development and to assign the corrective action to an owner for completion; and
 - iii. defining how corrective actions are monitored and verified for closure.

Lessons Learned

- 3.11.3 The contractor must provide a process to develop and share EH&S lessons learned, from its own investigations or as communicated by Suncor, with the contract workers for the duration of the SOW.

3.12 Audits and Assessments

Audits Assessments

- 3.12.1 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;
 - ii. a process for tracking and managing corrective actions.



4 Terms and Definitions

Term	Definition
Contract Worker	Individual contracted workforce personnel that are employed by the supplier.
Contractor	Any third party contracted by Suncor to complete On-Site work.
Contract EH&S Plan	The SOW-specific EH&S plan developed by the Contractor written in accordance with the EH&S Plan requirements document for the selected mode of Contractor. (Environment Health and Safety Guidelines for Mode 1 Contractors. Environment Health and Safety Guidelines for Mode 2 Contractors, or SUN-00204 Prime Contractor Management.)
Hands-On Work	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.
Hazard Identification Checklist	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.
Mode 2 Contractor	Applicable where the Contractor provides people, processes, equipment and/or facilities for the execution of the Scope of Work under the oversight, instructions and EH&S Management System of the Contractor. This mode requires interfacing or bridging with Suncor's EH&S-Management System. Suncor is responsible for assuring the overall effectiveness of the EH&S management controls put in place by the Contractor, including the interface with sub-contractors and ensuring that both Suncor's and the Contractor's EHS-MS are compatible. The Contractor reports EHS performance data and incidents to Suncor.
Scope of Work (SOW)	A document that clearly describes the materials or services to be supplied, and defines all requirements and obligations of both Suncor and the supplier, including, where applicable: environmental, health and safety, technical standards, specifications, quality, regulatory, and time/schedule.
Work Site	A location where a worker is, or is likely to be, engaged in any occupation.



Appendix A – Contract EH&S Plan Help

A1 About this document

This document assists contract companies with the development of a Mode 2 Contract EH&S Plan in compliance with Suncor Energy Inc. (Suncor) Environment, Health and Safety (EH&S) Requirements for Mode 2 Contractor, SCM-RQ-0002.

One of the most important contract management decisions is to identify the responsibilities for managing EH&S risks between client and Contractor. You have been identified by Suncor as a Mode 2 Contractor for the applicable scope of work. As a Mode 2 Contractor your activities will use many of your own EH&S management system documents to meet Suncor’s minimum EH&S requirements as detailed within your Contract EH&S Plan, but these must be coordinated with Suncor’s overall EH&S managements processes. You must bring trained, competent personnel to the SOW with Suncor and manage those personnel as per the requirements of your Contract and Contract EH&S Plan.

A2 Section 2 EH&S Requirements

Section 2 of the EH&S Requirements for Mode 2 Contractor communicates mandatory EH&S requirements that a Contractor must comply with to work with Suncor, the elements described within this section must be acknowledged by the Contractor and complied with as a term of your contract with Suncor. These requirements, however, are not required as a section of the Contract EH&S Plan. The information provided is also present in the Contract Documentation.

A3 Section 3 Contract EH&S Plan Overview and Requirements

Before you start

Section 3 of EH&S Requirements for Mode 2 Contractor outlines the required framework for your Mode 2 Contract EH&S Plan.

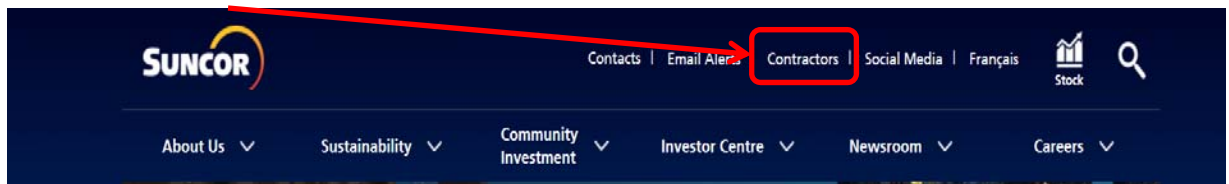
Tip: To assist you with development of your Contract EH&S plan you will receive the documents outlined in this table from Suncor. If you are missing any of these documents contact your Suncor representative.

Suncor provided Documentation	Description	Action
Scope of Work	Describes on-site services and materials to be supplied including all requirements and obligations of both Suncor and the Contractor.	Review and understand the SOW and its implications to your Contract EH&S Plan.

<p>Hazard Identification Checklist</p>	<p>Identifies Hazards relevant to the scope of work and provides a consequence rank.</p> <p>Specifically, it will identify the risk consequence as C1-C4 (low) or C5-C6 (high)</p>	<ol style="list-style-type: none"> 1. Review your Hazard Identification Checklist as provided by Suncor to ensure that all hazards that are directly related to the SOW are identified. Note the overall consequence ranking assigned to SOW. This determines the minimum required content (sections) for your Contract EH&S Plan. 2. If a hazard is not listed that you believe applies to the work, add it and ensure that it is mitigated as part of the Contract EH&S Plan development. 3. All added hazards should be discussed with Suncor prior to addition to the Contract EH&S Plan.
<p>Administrative Controls</p>	<p>A list of Suncor administrative controls to be used to mitigate the hazards identified in the Hazard Identification Checklist.</p>	<ol style="list-style-type: none"> 1. Retrieve the identified Suncor controls from www.Suncor.com. (Instructions on how to retrieve these documents can be found below this table). 2. Validate the list of hazard controls. 3. If hazards have been added to the Hazard Identification Checklist the administrative controls must also be identified to complete hazard assessment.
<p>EH&S Requirements for Mode 2 Contractor, SCM-RQ-0001</p>	<p>Outlines mandatory Suncor EH&S requirements (Section 2) and provides requirements to be included within the Contract EH&S Plan (Section 3).</p>	<p>Review Mode 2 Contractor EH&S requirements, SCM-RQ-0001 then complete and submit a Contract EH&S Plan to Suncor.</p>
<p>Training requirements</p>	<p>Suncor will provide a list of mandatory training.</p>	<p>Create a training matrix that includes the Suncor mandatory training as well as SOW specific training.</p>

Retrieving administrative controls

1. Navigate to <http://www.Suncor.com>
2. Click Contractors

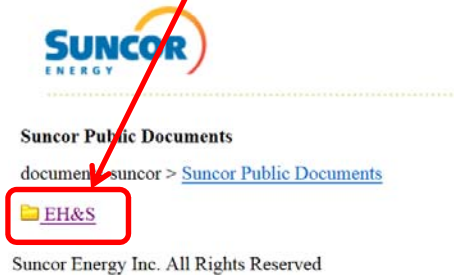


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3. Click Folders



4. Click on the EH&S folder and navigate to the folder for business area requesting the work.



Contract EH&S Plan Formatting Requirements

The Contract EH&S Plan must be scope specific and must follow the format of Section 3 of the EH&S Requirements for Mode 2 Contractor document. The first Section of the Contract EH&S Plan should be 3.1 Scope of Work followed by Sub-section 3.1.1.

Tip: Cross reference the consequence ranking indicated in the scope specific Hazard Identification Checklist with the table on page 7 of the EH&S Requirements for Mode 2 Contractor to understand the requirements that must be addressed in your Contract EH&S Plan.

Scopes of Work with C1-C4 consequence ranking should include the following eight highlighted sections:

Section #	Contract EH&S Plan Requirements	C1 - C4
3.1	Scope of Work	Required
3.2	Health & Safety Management	Required
3.3	Environmental Management	Required
3.4	Learning and Competency	Required
3.5	Emergency Management	Required

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3.6	Sub-Contractor Management	Required
3.7	Leadership Accountability	Required
3.8	Management of Change	Not Required
3.9	Regulatory Compliance	Required
3.10	EH&S Governing Documents	Not Required
3.11	Incident and Corrective Action Management	Not Required
3.12	Audits and Assessments	Not Required

Scopes of Work with C5-C6 consequence ranking should include the following twelve highlighted sections:

Section #	Contract EH&S Plan Requirements	C5 - C6
3.1	Scope of Work	Required
3.2	Health & Safety Management	Required
3.3	Environmental Management	Required
3.4	Learning and Competency	Required
3.5	Emergency Management	Required
3.6	Sub-Contractor Management	Required
3.7	Leadership Accountability	Required
3.8	Management of Change	Required
3.9	Regulatory Compliance	Required
3.10	EH&S Governing Documents	Required
3.11	Incident and Corrective Action Management	Required
3.12	Audits and Assessments	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.

Guidance to develop the Contract EH&S Plan Sections

Tip: This should include, at a minimum, an overview of the work to be done, estimated size of the work force and the estimated duration.

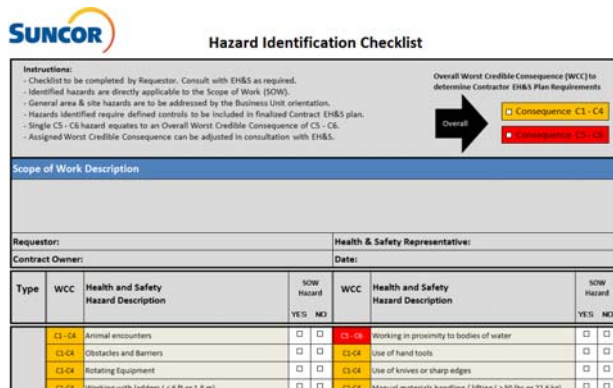
A3.1 Scope of Work

Use the SOW document provided by Suncor to provide details of the work covered by this Contract EH&S Plan.

A3.2 Health and Safety Management

A3.2.1 Hazard Assessment

Review the Hazard Identification Checklist provided to you by Suncor; identify additional health and safety hazards as required.



SUNCOR Hazard Identification Checklist

Instructions:

- Checklist to be completed by Requestor. Consult with EH&S as required.
- Identified hazards are directly applicable to the Scope of Work (SOW).
- General area & site hazards are to be addressed by the Business Unit orientation.
- Hazards identified require defined controls to be included in finalized Contract EH&S plan.
- Single CS - C6 hazard equates to an Overall Worst Credible Consequence of CS - C6.
- Assigned Worst Credible Consequence can be adjusted in consultation with EH&S.

Overall Worst Credible Consequence (WCC) to determine Contractor EH&S Plan Requirements

Overall → Consequence C1 - C4 or Consequence C5 - C6

Scope of Work Description

Requestor: _____ Health & Safety Representative: _____
 Contract Owner: _____ Date: _____

Type	WCC	Health and Safety Hazard Description	SOW Hazard		WCC	Health and Safety Hazard Description	SOW Hazard	
			YES	NO			YES	NO
C1 - C4		Animal encounters	<input type="checkbox"/>	<input type="checkbox"/>	C5 - C6	Working in proximity to bodies of water	<input type="checkbox"/>	<input type="checkbox"/>
C1 - C4		Obstacles and Barriers	<input type="checkbox"/>	<input type="checkbox"/>	C1 - C4	Use of hand tools	<input type="checkbox"/>	<input type="checkbox"/>
C1 - C4		Rotating Equipment	<input type="checkbox"/>	<input type="checkbox"/>	C1 - C4	Use of knives or sharp edges	<input type="checkbox"/>	<input type="checkbox"/>
C1 - C4		Working with ladders (< 6 ft or 1.8 m)	<input type="checkbox"/>	<input type="checkbox"/>	C1 - C4	Manual materials handling / lifting (> 50 lbs or 22.6 kg)	<input type="checkbox"/>	<input type="checkbox"/>

Tip: Hazards indicated in the Hazard Identification Checklist are those directly related to the scope of work. For example, if a Contractor is working on a pump the hazards directly related to that scope of work must be identified. In this case “Use of hand tools” would be one of the hazards selected. If the pump is part of a system that circulates water and workers will interact with water under pressure then “water, steam and condensate under pressure” would be identified.

If there is a large propane tank on-site that is in no way related to the scope of work this would not be identified on the Hazard Identification Checklist as it is a general area / site hazard. Contract Workers are made aware of the tanks existence through the area orientation as well as discussions on general area / site hazards with their supervisor. In the event of an emergency, related to the tank, the appropriate area emergency management procedures must be followed.

A3.2.2 Provide a scope specific assessment that expands on the health and safety hazards (as defined in the Hazard Identification Checklist) and includes:

- i. the tasks to be performed;
- ii. identification of the health and safety hazards;
- iii. risks prior to the application of controls;
- iv. identification of controls to mitigate the health and safety hazards; and
- v. residual risk after the control has been applied.

Formal Hazard Assessment Template (sample)

Immediate Mobilization Scope of Work:					
Business Unit:		Location:		Contractor:	

Tasks (List all tasks/activities of the scope of work)	Hazards (List all existing and potential health and safety hazards)	Consequence	Likelihood	Risk	Controls (List the controls for each hazard: Elimination, Engineering, Administrative, Personal Protective Equipment)	Residual Risk

Date of Assessment:		Assessor:	
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Tip: Consider using the above sample (based on the [Alberta Government Hazard Assessment and Control Handbook](#)) as guidance to meet the requirements of Section 3.2.2. Ensure a copy of your risk matrix is provided in your Contract EH&S Plan.

Your assessment should also indicate leadership accountability to mitigate high severity hazards and ensure your hazard controls are integrated with the execution of work (e.g., align controls with toolbox talks, field level hazard assessment process, training and procedures)

A3.2.3 The contractor must provide examples of the following tools or of equivalent tools used for the SOW:

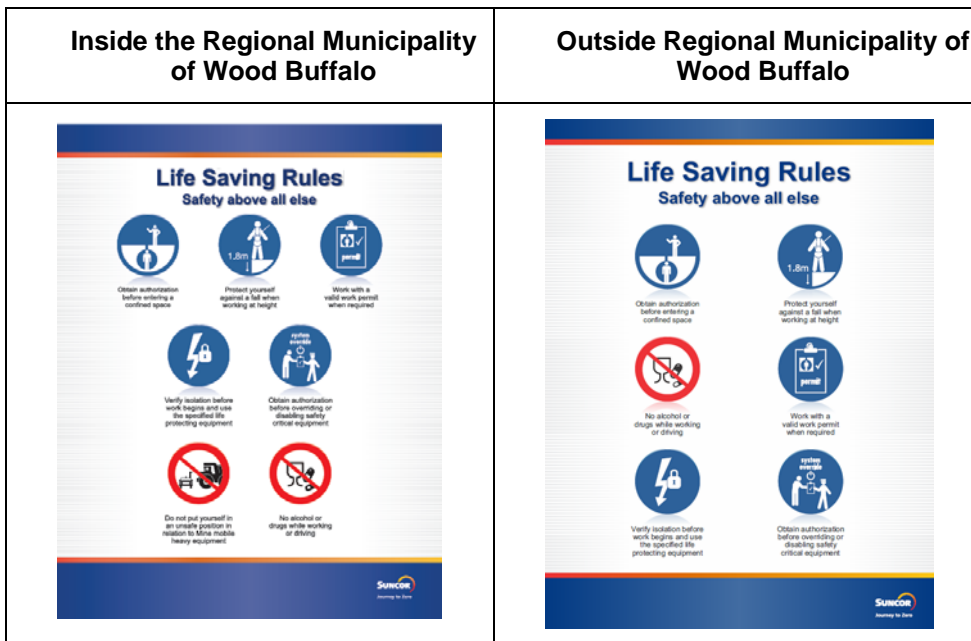
- i. field assessment tool(s) for example, field level hazard assessment (FLHA), field level risk assessment (FLRA) or job hazard analysis (JHA)); and

- ii. observation program(s) (for example, workplace observation, safety observation, or focus observation programs).

A3.2.4 Life Saving Rules

Indicate how Suncor’s Life Saving Rules (LSRs) will be communicated to Contract Workers, including how you will verify compliance. This may be communicated during site orientation, through toolbox talks and/or safety meetings on an ongoing basis.

Tip: Highlight how LSRs will be communicated to Contract Workers prior to the start of work and throughout the completion of the scope of work. As well highlight how this communication and compliance to LSRs will be verified.



A3.2.5 Fit for duty

Indicate how the health and welfare of the Contract Workers will be ensured, including:

- i. indicating the service provider(s) for post-incident and reasonable cause alcohol and drug testing;
- ii. providing an understanding of what controls are in place for prescription medication in the workplace;
- iii. determining health and wellness requirements to perform scope of work (for example, medical assessments, audiometric and vision testing); and
- iv. requirements to ensure PPE, such as respirators or fall protection, are properly fit tested, used and maintained.

Tip: When developing controls to ensure the health and welfare of Contract Workers consider the following example for 3.2.5(ii) as guidance for the level of detail expected within this section:

“As per policy _____ employees are required to disclose prescription medications. If the prescription will affect the employee’s ability to work safely the situation is assessed and actioned per policy.”

Note: This is an example only. Your responses should reflect how your process addresses each of these areas.

A3.3 Environmental Management

A3.3.1 Review the Hazard Identification Checklist provided by Suncor to identify any additional environmental factors or hazards relevant to the SOW.

A3.3.2 Identify all controls required to manage the environmental hazards, including any Suncor identified environmental controls and any additional controls identified as required by the contractor.

Tip: When developing controls to for identified environmental hazards consider the following as guidance for the level of detail expected within this section:

Hazard	Source	Prevention Measures
Surface water run-off impacts	Equipment	<ul style="list-style-type: none"> • Keep all equipment clean of drips and stains • Equipment should be serviced according to the manufacturer's recommendations • Use appropriate spill prevention controls when fueling

Note: This is an example only. Your responses should reflect how your safety management system addresses each of these areas.

A3.4 Learning and Competence Requirements

A3.4.1 Provide a training matrix that includes the Suncor mandatory training as well as scope specific training requirements.

Tip: Suncor will provide a list of Suncor mandatory training to include within your matrix, you will indicate any additional scope specific training requirements to address the hazards associated with the SOW.

When developing training controls consider the following as guidance for the level of detail expected for 3.4.1:

Mandatory Training for Contractor	Description	Duration	Details	Provider	Supervisor	Employee	EHS Personal	Provided by Suncor	Provided by Contractor	Comments
Pre- Hands on Work- Mandatory Training (Required as per scope of Work)										
H2S Alive	An overview of H2S properties, hazards and risks of H2S exposure, and emergency and rescue procedures.	N/A	http://www.enform.ca/	Enform or Similar	X	X	X		X	Required as per SOW, Mandatory training to be provided by Contractor

Note: this is an example only your responses should reflect how your training matrix.

A3.4.2 Indicate how competency of Contract Workers to execute the SOW will be ensured.

A3.4.3 Indicate how competency of supervision to execute the SOW will be ensured.

Tip: Explain your process for deeming workers and supervisors as competent. This may include training, followed by supervisory verification, and certification. Provide any supporting documentation such as a blank copy of your competency assessment forms.

A3.5 Emergency Management

A3.5.1 The contractor must provide scope specific emergency response procedures based on applicable hazards, including any specialized emergency resources (people and equipment).

A3.5.2 Once the contract is awarded, the contractor must work with Suncor to develop a scope specific Emergency Response Plan (ERP) that:

- i. aligns with Suncor business unit-specific ERP;
- ii. includes the contractor’s emergency response procedures;
- iii. includes a schedule of drills and exercises, if applicable;

TIP: If your work duration is short you may not have a schedule.

- iv. includes roles and responsibilities and organization structure;
- v. identifies the emergency response service provider; and

TIP: If your work working in a Suncor plant this may be Suncor emergency services; however if you are working remotely it may be the local area municipality.

- vi. identifies the communication process for activating the emergency response service provider.

TIP: For preliminary Contract EH&S Plans provide scope specific emergency response procedures that address hazards identified in the Hazard Identification Checklist provided by Suncor.

When contract is awarded the Contractor will develop a scope specific ERP that aligns with the Suncor business area ERP, if you have questions contact your Suncor representative

A3.6 Sub-Contractor Management

TIP: If sub-contractors will not be engaged for this scope of work, you do not need to complete this section. Write “not applicable” and delete the requirements in this section.

A3.6.1 If using sub-contractors to perform any portion of the SOW:

- i. provide the names of the sub-contractor(s);
- ii. define the specific scope of work 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 your approved Contract EH&S Plan.

Tip: Consider the following draft topics for sub-contractor accountability:

- Pre-qualification and selection
- Competency to perform the work
- Hazard identification and Controls
- Mobilization
- Performance management

Note: This is not an exhaustive list. Detail your process for holding sub-contractors

A3.7 Leadership Accountability

A3.7.1 Provide a summary of the expectations and frequency your leaders will 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.

A3.7.2 The contractor must provide an organizational structure that includes:

- i. an organization chart depicting the relationship between EH&S workers, upper management and line management workers executing the SOW; and
- ii. roles and responsibilities of the EH&S personnel in executing the SOW.

Tip: A table may be the best way to depict management accountabilities for 3.6.1 item “i” an example of the level of detail required can be seen in the following:

	Toolbox Talks	Safety Meetings	Observations	Inspections
General Manager	Quarterly	Quarterly	Quarterly	Quarterly
Operations Manager	Weekly	Monthly	Monthly	Monthly
Supervisor	Daily	Weekly	Daily	Daily

Note: This is an example only. Your responses should reflect management accountabilities within your safety management system. There may be additional roles i.e. EH&S that should be included.

Tip: Provide a written description of management accountabilities for 3.7.1 items (ii) through (iv) an example of the level of detail required can be seen in the following:

“Management is accountable for one workplace inspection per month, Supervision is expected to participate in one workplace inspection per shift cycle, lead hands are accountable for four per shift cycle and EH&S is expected to conduct one workplace inspection per Work Site per shift cycle.”

Note: This is an example only. Your responses should reflect management accountabilities within your safety management system. There may be additional roles i.e. EH&S that should be included.

A3.8 Regulatory Compliance

Tip: Suncor will provide a regulatory requirements document if this is section is applicable.

A3.8.1 If Suncor has identified regulatory requirements and compliance tasks for the contractor to manage, the contractor must indicate how those requirements and risks associated with each compliance task will be managed, including:

- i. coordinating with Suncor for obtaining the required approvals and permits prior to starting work; and
- ii. defining the process for completing compliance items.

A3.8.2 The contractor must provide a process for external regulatory communication with Suncor, including:

- i. notification to Suncor of any event that may require regulatory reporting;
- ii. responsibility to contact external regulator; and

Tip: Suncor has the responsibility to contact external regulators pertaining to all regulatory compliance incidents that take place on Suncor sites.

- iii. Obtaining approval for non-regulatory external communication.

A3.9 Management of Change

This section is only required for C5-C6 consequence Scopes of Work; it is optional for C1-C4 Scopes of Work.

A3.9.1 The contractor must provide a management of change process that indicates how changes to the SOW and the Contract EH&S Plan will be identified, reviewed, managed, approved and communicated.

A3.10 EH&S Governing Documents

This Section is only required for C5-C6 consequence Scopes of Work; it is optional for C1-C4 Scopes of Work.

A3.10.1 The contractor must provide a list of EH&S documents that will be followed for the SOW.

Tip: EH&S governance documents (both yours and Suncor's) identified as administrative controls for the SOW need to be listed in this Section of your Contract EH&S Plan.

A3.11 Incident and Corrective Action Management

This Section is only required for C5-C6 consequence Scopes of Work; it is optional for C1-C4 Scopes of Work.

A3.11.1 The contractor must provide an incident management process that, at a minimum, includes:

- i. how the contractor will ensure immediate reporting to Suncor of any incident with or without a loss;
- ii. how the contractor will ensure appropriate classification of occupational injuries and illnesses;

- iii. the incident investigation process, including roles and responsibilities, and leadership involvement; and
- iv. the process for identifying root causes.

Tip: High severity (actual and potential) events should be evaluated with a formal root cause system such as TapRoot.

- A3.11.2** The contractor must indicate how corrective actions from incidents, audits and assessments will be addressed, including:
- i. defining how risks associated with undesirable situations are reduced to an acceptable level;
 - ii. defining who is the responsible person to oversee corrective action scope development and to assign the corrective action to an owner for completion; and
 - iii. defining how corrective actions are monitored and verified for closure.

- A3.11.3** The contractor must provide a process to develop and share EH&S lessons learned, from its own investigations or as communicated by Suncor, with the contract workers for the duration of the SOW.

Tip: Describe how learnings are developed and communicated throughout your organization.

A3.12 Audits and Assessments

This Section is only required for C5-C6 consequence Scopes of Work; it is optional for C1-C4 Scopes of Work.

- A3.12.1** Provide a summary of the audit and assessment activities for monitoring EH&S performance against your Contract EH&S Plan that includes:
- i. a schedule or frequency of self-assessments and/or audits;
 - ii. a process for tracking and managing corrective actions.

Tip: Provide a written description or table for 3.12.1(i). An example of the level of detail required is shown below:

- The Operations Manager is responsible for the implementation of the audit program.
- Supervisors are responsible for conducting formal and informal weekly inspections of job sites they control and for directly involving workers in such inspections.
- Compliance audits are performed monthly by supervisors with the assistance of the EH&S department.
- Workers are responsible for participating in and contributing to the audit program.

Note: This is an example only. Your responses should reflect t your schedule of assessments or audits.

Tip: Provide a written description for 3.12.1(ii). An example of the level of detail required is shown below:

Upon completion of inspection, results and recommendations are reviewed with management for further evaluation, and discussed with employees. An action plan is developed to close gaps and a verification plan is put in place to ensure the action plan is effective. Action plans are developed within our _____ management system, which tracks and prompts closure of action items.

Note: This is an example only. Your responses should reflect your audits and corrective action process.