



## **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

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### 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).**

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### Scope

This document is part of Element 10 Contractor Management.

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### Target Audience

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

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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 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.

	<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>
	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"><li>i. field assessment tool(s) for example, field level hazard assessment (FLHA), field level risk assessment (FLRA) or job hazard analysis (JHA); and</li><li>ii. observation program(s) (for example, workplace observation, safety observation, or focus observation programs).</li></ul>
<b>Life Saving Rules</b>	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.
<b>Fit for Duty</b>	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"><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>

**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-exhausting 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
<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 2 Contractor</b>	Applicable where the Contractor provides people, processes, equipment and/or facilities for the execution of the SOW under the oversight, instructions and EH&S-MS of the Contractor. This mode requires interfacing or bridging with Suncor's EH&S-MS. 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 EH&S-MS are compatible. 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.