



## **Enterprise Life Saving Rules Guideline**

Effective Date: May 1, 2020  
Owned by: Director, Central Safety  
Reviewed every 5 years  
Livelihood ID: 653479358

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## Summary of Changes

This Summary shows:

- The location of each change within the document
- All changes to this document since it was last approved and published

Location of Change	Summary of Change
Entire Document	This is the initial revision of the document.



**R#** Requirements changed in the new revision will be identified with a revision triangle beside it.



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## 1 About this Guideline

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**Purpose** The purpose of this document is to provide guidance for the consistent classification of Life Saving Rule violations across all Suncor operational areas or while conducting business on behalf of Suncor.

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**Scope** The scope of this Guideline includes:

- Providing information regarding the main requirements related to Suncor’s Life Saving Rules.
- Defining key terms related to Life Saving Rules violations and providing examples of common Life Saving Rule violation scenarios.

**Note:** For additional information refer to your local processes, programs and policies and/or legislation

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**Target Audience** This Guideline applies to Suncor Energy Inc. and subsidiaries over which Suncor has operational control (collectively “Suncor” or “the company” or “enterprise-wide”).

As used in this document, “Suncor personnel” includes directors, officers, employees and independent contractors (formerly referred to as contract workers) of Suncor.

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**Introduction** Suncor’s Life Saving Rules are intended to support existing Suncor management system processes, programs and policies related to health and safety.

- The rules focus on the activities which, through rigorous industry data analysis, have been shown to most likely result in fatalities.
- Each rule consists of an icon and life saving actions Suncor personnel must take to prevent a work-related fatality.
- These rules are based upon the International Association of Oil and Gas Producers (IOGP) and Energy Safety Canada (ESC) to maximize alignment with industry peers and contractors.

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## 2 Life saving rules violations

A **life saving rule violation** is considered as any deviation of a **main rule requirement** (includes all items in the life saving rule tables within Section 3).

- All incidents involving a rule violation will be investigated following specific business area processes for incident investigation.
- The decision on disciplinary actions for Suncor personnel involved in violations, if required, will be taken after the incident investigation is completed.

### 3 Life saving rules description and violation details

#### 3.1 Confined space

	<p><b>Rule description:</b></p> <p><b>Obtain authorization before entering a confined space</b></p>
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**Additional guidance**

- a. The term “entering” a confined space varies depending on legislation and local area requirements. Please ensure you are familiar with the confined space requirements for your local area.

**Confined space rule violations**

Main rule requirements	Examples of violations
<b>Confirm energy sources are isolated</b>	<ul style="list-style-type: none"> <li>Entering or allowing the entrance to a confined space without confirming energy sources are isolated</li> </ul>
<b>Confirm the atmosphere has been tested and is monitored</b>	<ul style="list-style-type: none"> <li>Testing and monitoring of the atmosphere is not conducted or confirmed before entry as per the work permit, hazard assessment or work procedure requirements</li> </ul>
<b>Check and use breathing apparatus when required</b>	<ul style="list-style-type: none"> <li>Entering a confined space without wearing the required breathing apparatus</li> </ul>
<b>Confirm there is an attendant standing by</b>	<ul style="list-style-type: none"> <li>Entering a confined space when no attendant is present</li> </ul> <p><b>Note:</b> Where its use is approved by the local business area (and applicable regulatory agencies, where appropriate), continuous remote monitoring is considered to satisfy the main rule requirement for an attendant to stand by the confined space.</p>
<b>Confirm a rescue plan is in place</b>	<ul style="list-style-type: none"> <li>A rescue plan is not in place while activities are performed inside a confined space</li> </ul>



<b>Obtain authorization to enter</b>	<ul style="list-style-type: none"><li>• Entering a confined space without authorization (per applicable area safe work practice requirements)</li></ul>
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### 3.2 Working at height

	<p><b><u>Rule description:</u></b></p> <p><b>Protect yourself against a fall when working at height</b></p>
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**Additional guidance**

- a. At Suncor, working at heights is considered as any activity performed at 1.8 meters (6 feet) or higher.
- b. Protected areas may include stairs with handrails, approved scaffolds, access and egress on and off equipment or any other enclosed or approved area at height where the use of fall protection is not required and meets regulatory requirements.
- c. Approved anchor points are those that are capable of safely withstanding the potential impact forces applied as a result of a fall and meet or exceed any other applicable regulatory requirements.

**Note:** The minimum height for “work at heights” may be lower than 1.8 m depending on legislation and local area requirement of your location. Please ensure you are familiar with the requirements for work at heights in your local area.

**Working at height rule violations**

Main rule requirements	Examples of violations
<p><b>Inspect fall protection equipment before use</b></p>	<ul style="list-style-type: none"> <li>• Fall protection equipment is not inspected prior to use or the equipment is used when deficiencies are identified</li> </ul>
<p><b>Secure tools and work materials to prevent dropped objects</b></p>	<ul style="list-style-type: none"> <li>• Hand tools and materials are not properly secured as required by the work permit, hazard assessment or work procedures (e.g. tool tethers/lanyards, material strapping, wind walls, plywood decking, etc.) while working above an area where Suncor personnel may be present</li> </ul>
<p><b>Tie off 100% to an approved anchor point while outside of a protected area</b></p>	<ul style="list-style-type: none"> <li>• Fall protection is not used when working at height outside a protected area</li> <li>• Attaching a fall protection system to an anchor point which has not been approved or certified for use for work at heights</li> </ul>



<b>Additional rule requirements</b>	<ul style="list-style-type: none"><li>• Fall protection is used in a manner that does not offer sufficient clearance if an arrested fall occurs</li></ul>
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### 3.3 Work authorization

	<p><b><u>Rule description:</u></b></p> <p><b>Work with a valid permit when required</b></p>
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**Additional guidance**

- a. A work permit is a written form used to authorize jobs that expose Suncor personnel to potential hazards. It identifies the work to be done, the hazards involved, and the necessary preparation and precautions for the job. A permit is considered as valid when:
  - a.1. Work is performed inside the permit parameters, including:
    - Date
    - Time
    - Location
    - Scope
  - a.2. All required work authorizations are obtained prior to work execution.
- b. Life protecting equipment refers to devices designed to protect a worker from serious injury or fatality while performing high risk activities (including but not limited to: arc flash equipment, breathing apparatus, fall protection, gas detector, etc.).
- c. Changing conditions that require reassessment of the work may include:
  - Changes in the scope that was originally planned and captured on the permit
  - Changes in work environment
  - Changes in equipment
  - Changes in process or operating parameters
  - Changes in personnel

**Work authorization rule violations**

Main rule requirements	Examples of violations
<p><b>Confirm if a permit is required</b></p>	<ul style="list-style-type: none"> <li>• Work is started without confirming whether a work permit is required (i.e. with no permit)</li> </ul>

<p><b>Confirm having authorization to perform the work</b></p>	<ul style="list-style-type: none"> <li>• Working without a valid work permit, i.e. working without required authorizations (including signatures of authorizers confirming that work can be conducted)</li> </ul> <p><b>Note:</b> While workers may also be required to sign-off the permit to confirm understanding of the work scope, these signatures are not considered as “authorizing” signatures for the purpose of this main rule requirement</p>
<p><b>Understand the permit</b></p>	<ul style="list-style-type: none"> <li>• Working outside of the scope of the work permit, including working in the wrong location or on the wrong equipment</li> </ul>
<p><b>Have confirmed that hazards are controlled and it is safe to start</b></p>	<ul style="list-style-type: none"> <li>• Life protecting equipment identified on the work permit is not utilized</li> </ul>
<p><b>Stop and reassess if conditions change</b></p>	<ul style="list-style-type: none"> <li>• A significant change occurs and is identified, but it is not brought to the supervisor’s and/or permit issuer’s attention and work continues</li> </ul>

### 3.4 Energy isolation

	<p><b><u>Rule description:</u></b></p> <p><b>Verify isolation and zero energy before work begin</b></p>
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**Additional guidance**

- a. Energy sources may be pneumatic, hydraulic, mechanical, gravitational, chemical, electrical, nuclear, thermal or any other energy that could cause injury.
- b. For energy isolation to be an effective barrier, the energy must be turned off (de-energized, disconnected, etc.), locked out (or secure with an equally effective means as approved by business area processes) and tagged.
- c. Testing for residual or stored energy may involve measuring pressure, gas detection, electricity and radiation measurements, etc.

**Energy isolation rule violations**

Main rule requirements	Examples of violations
<b>Have identified all energy sources</b>	<ul style="list-style-type: none"> <li>• Energy sources associated with the work scope are not identified as part of the work permit or hazard assessment</li> </ul>
<b>Confirm that hazardous energy sources have been isolated, locked, and tagged</b>	<ul style="list-style-type: none"> <li>• Hazardous energy associated with the work scope is not isolated, locked and/or tagged</li> <li>• An individual or department lock is not applied to an isolation (or lockbox) as required by the work permit, hazard assessment or work procedures</li> </ul>
<b>Have checked there is zero energy and tested for residual or stored energy</b>	<ul style="list-style-type: none"> <li>• Testing for residual or stored energy is not conducted per the work permit, hazard assessment or work procedures</li> </ul>

### 3.5 Line of fire

	<p><b><u>Rule description:</u></b></p> <p><b>Keep yourself and others out of the line of fire</b></p>
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**Additional guidance**

- a. Line of fire occurs when the path of a moving object or the release of hazardous energy intersects with an individual's body.
- b. This rule replaces the previous "Do not put yourself in an unsafe position in relation to Mine mobile heavy equipment" rule that was only applicable to the RMWB.

**Line of fire rule violations**

Main rule requirements	Examples of violations
<p><b>Position yourself to avoid:</b></p> <ul style="list-style-type: none"> <li>- <b>Moving objects</b></li> <li>- <b>Vehicles</b></li> <li>- <b>Pressure releases</b></li> <li>- <b>Dropped objects</b></li> </ul>	<ul style="list-style-type: none"> <li>• An individual knowingly positions themselves in the line of fire of moving vehicles, moving objects, or potential dropped objects where there is a risk of serious injury or fatality</li> </ul>
<p><b>Establish and obey barriers and exclusion zones</b></p>	<ul style="list-style-type: none"> <li>• Not establishing barriers or exclusion zones to prevent exposures to line of fire hazards.</li> </ul> <p><b>Note:</b> For the purpose of this guideline, <b>entering</b> an exclusion zone or <b>crossing</b> a barrier without authorization will be considered a violation of the bypassing safety controls Life Saving Rule</p>
<p><b>Take action to secure loose objects and report potential dropped objects</b></p>	<ul style="list-style-type: none"> <li>• Loose equipment at height or objects at risk of falling are not controlled or reported to appropriated supervision when identified where there is a risk of serious injury or fatality</li> </ul>

### 3.6 Bypassing safety controls

	<p><b>Rule description:</b></p> <p><b>Obtain authorization before overriding or disabling safety controls</b></p>
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**Additional guidance**

- a. Safety-critical equipment must be in good working condition to keep you safe.

**Note:** Please refer to the Operational Excellence Management System and Process Safety Definitions Document (SUN-00208) for the definition of “Process Safety Critical Assets” (equipment).

Examples of safety critical equipment include:

- Isolation devices
- Relief valves
- Emergency shutdown devices (ESD)
- Lock-out / Tag-out devices
- Fire and gas detection controls
- Emergency breathing apparatus (SCBA)
- In-vehicle monitoring systems
- Electronic logging device (ELD)
- Drug and alcohol test equipment

**Bypassing safety controls rule violations**

Main rule requirements	Examples of violations
<p><b>Understand and use safety-critical equipment and procedures which apply to my task</b></p>	<ul style="list-style-type: none"> <li>• Exceeding the safe operating design limits for process equipment</li> <li>• Gas detection alarms are ignored (including personnel gas detectors)</li> </ul>
<p><b>Obtain authorization before:</b></p> <ul style="list-style-type: none"> <li>- <b>Disabling or overriding safety equipment</b></li> <li>- <b>Deviating from procedures</b></li> <li>- <b>Crossing a barrier</b></li> </ul>	<ul style="list-style-type: none"> <li>• An emergency protection device is bypassed without authorization</li> <li>• An individual or department lock is removed without authorization</li> <li>• Gas or fire detection are bypassed without authorization</li> </ul>

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	<ul style="list-style-type: none"><li>• Tampering with plant emergency equipment including: SCBAs, safety showers, fire extinguishers, etc.</li><li>• Tampering with in-vehicle monitoring systems (i.e. disabling safety equipment)</li><li>• An exclusion zone is entered or barrier is crossed without authorization from the individual in control of the area</li></ul>
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### 3.7 Driving

	<p><b>Rule description:</b></p> <p><b>Follow safe driving rules</b></p>
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#### Driving rule violations

Main rule requirements	Examples of violations
<p><b>Always wear a seatbelt</b></p>	<ul style="list-style-type: none"> <li>A seatbelt (when provided) is not worn by the driver or passenger(s) while the vehicle (including light and heavy vehicles, site shuttles and coach buses) is in motion</li> </ul>
<p><b>Do not exceed the speed limit, and reduce my speed for road conditions</b></p>	<ul style="list-style-type: none"> <li>The vehicle is traveling <u>over the posted speed limit</u></li> </ul> <p><b>Note:</b> The determination on the classification of LSR violations for speed limit infractions should be made by local management in consideration of the specific circumstances of the incident and area internal processes</p>
<p><b>Do not use phones or operate devices while driving</b></p>	<ul style="list-style-type: none"> <li>The driver uses an unauthorized electronic device while the vehicle is in motion (as identified per area or legislation requirements)</li> </ul>
<p><b>Being fit, rested and fully alert while driving</b></p>	<p><b>Note:</b> For the purpose of this guideline, not being fit for duty and, rested and fully alert while driving will be considered a violation of the fit for duty Life Saving Rule</p>
<p><b>Follow journey management requirements</b></p>	<ul style="list-style-type: none"> <li>Conditions change during the journey when an extreme weather storm moves in and the driver does not stop and reassess the journey</li> </ul> <p><b>Note:</b> Journey management plans may not be required for all areas and journey types. Please refer to local business area requirements for journey management</p>

### 3.8 Hot work

	<p><b>Rule description:</b></p> <p><b>Control flammables and ignition sources</b></p>
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**Additional guidance**

- a. Ignition sources in relation to hot work may include welding, braising, cutting and any other activity that may generate an open flame or heat source.
- b. Residual or stored energy in the form of trapped flammable gases and vapours may be present in equipment and must be controlled before starting any hot work.
- c. Continuous gas monitoring will be performed during hot work, if determined to be required by the work permit, hazard assessment or work procedures.

**Note:** For the purpose of this guideline, a hazardous area is defined as an area where the fire or explosion hazards may exist due to a flammable atmosphere and/or mixture.

Please refer to your local area hazardous area designations/requirements when determining whether work is taking place in a hazardous area.

**Hot work violations**

Main rule requirements	Examples of violations
<p><b>Identify and control ignition sources</b></p>	<ul style="list-style-type: none"> <li>• Flammable materials around hot work activities are not removed or isolated</li> <li>• Hot work sparks are not appropriately controlled to prevent contact with flammable/combustible material</li> </ul>
<p><b>Before starting any hot work:</b></p> <ul style="list-style-type: none"> <li>- <b>Confirm flammable material has been removed or isolated</b></li> <li>- <b>Obtain authorization</b></li> </ul>	<ul style="list-style-type: none"> <li>• Process equipment subject to hot work is not purged to remove trapped ignitable vapours and reduce hydrocarbon content below the acceptable range required for hot work</li> <li>• Hot work (as defined by local area procedures) is conducted without a valid hot work permit</li> </ul>

<p><b>Before starting hot work in a hazardous area, confirm:</b></p> <ul style="list-style-type: none"><li>- <b>A gas test has been completed</b></li><li>- <b>Gas will be monitored continually</b></li></ul>	<ul style="list-style-type: none"><li>• Combustible gas testing is not conducted before and during hot work activities, as required by the work permit, hazard assessment or work procedures.</li></ul> <p><b>Note:</b> The term “continually” is meant to be at a frequency dictated by the business area based on local requirements and is not a new requirement for <b>continuous</b> monitoring through the execution of the hot work</p>
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### 3.9 Safe mechanical lifting

	<p><b><u>Rule description:</u></b></p> <p><b>Plan lifting operations and control the area</b></p>
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**Additional guidance**

- a. Safe mechanical lifting applies to equipment or loads that are lifted by mechanical means.
- b. A suspended load is an object that is temporarily lifted and hangs above the ground. This applies to equipment and loads that have not been designed for Suncor personnel to be in the area below the load at any time.
- c. A lift plan identifies the weights and dimensions, how the lift will progress, communication requirements (signal personnel), weather and ground conditions, etc. and should be completed for any mechanical liftings as required by local area work procedures.
- d. Line of fire is a significant hazard with overhead loads and moving equipment.

**Safe mechanical lifting rule violations**

Main rule requirements	Examples of violations
<p><b>Confirm that the equipment and load have been inspected and are fit for purpose</b></p>	<ul style="list-style-type: none"> <li>• The lift is conducted with equipment or with a lifting point that does not have the proper certifications for the lift</li> <li>• A lift is conducted beyond the working load limits of the lifting equipment</li> </ul>
<p><b>Only operate equipment that worker is qualified to use</b></p>	<ul style="list-style-type: none"> <li>• The lift operator is not trained and competent to conduct the lift, in accordance with local area requirements, but does so anyway</li> </ul>
<p><b>Establish and obey barriers and exclusion zones</b></p>	<p><b>Note:</b> For the purpose of this guideline, a failure to establish a barrier and exclusion zone during lifting activities will be considered a violation of the <b>line of fire</b> Life Saving Rule</p>
<p><b>Never walk under a suspended load</b></p>	<ul style="list-style-type: none"> <li>• The load is positioned in such a way that it puts Suncor personnel under the suspended load</li> </ul>



Additional rule requirements	<ul style="list-style-type: none"><li>• A lift is conducted without a lift plan as per the work permit, hazard assessment or work procedure requirements</li><li>• A safe distance is not maintained from overhead powerlines</li></ul>
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### 3.10 Fit for duty

	<p><b><u>Rule description:</u></b></p> <p><b>Be in a state to perform work safely</b></p>
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**Additional guidance**

- a. Suncor personnel who are physically and mentally in a state to conduct their assigned duties are:
- Physically capable of performing the duties (physical demands)
  - Rested (not impaired by fatigue)
  - Mentally alert (mind on task)
  - Able to effectively communicate to their supervisor and co-workers
  - Not under the influence of drugs and alcohol

**Fit for duty rule violations**

Main rule requirements	Examples of violations
Be physically and mentally in a state to perform assigned duties	<ul style="list-style-type: none"> <li>• A Suncor’s personnel is taking prescription medication or over-the-counter medication that is likely to affect their performance and have not disclosed this to their employer</li> </ul>
Commit to not being under the influence of alcohol or drugs	<ul style="list-style-type: none"> <li>• A Suncor personnel violated Suncor’s Alcohol &amp; Drug policy</li> <li>• An individual consumes alcohol or uses illegal or prohibited drugs at site (including cannabis)</li> </ul>
Inform a supervisor immediately if worker or a co-worker may be unfit for work	<ul style="list-style-type: none"> <li>• An unfit individual is observed by a supervisor or co-worker but not reported</li> </ul>

## 4 LSR investigation guidance

- Upon identification of an incident involving a potential lifesaving rule violation, the incident owner should proceed with the investigation as required by the applicable Business Area incident management process.
- Using the examples provided in section 3 of this guideline, the incident owner should determine if there was a violation of a LSR main requirement. If a violation is confirmed, the incident should be classified as a LSR violation in the incident management tool and the incident owner should proceed to identify incident causes.
- When identifying incident causes, incident owners should consider (among others) the following factors, which may have contributed to the incident:
  - **The training of personnel involved in the incident:** evaluate if the rule violation occurred because Suncor personnel involved were not aware or did not understand the rule requirements.
  - **Work processes / procedures:** evaluate if the rule violation occurred because the work process/procedure was not clear or well understood by Suncor personnel or if the job could not be completed as indicated by following the main rule requirements.
  - **Supervisory direction:** evaluate if the rule violation occurred because:
    - workers were following their supervisor instructions
    - worker thought it was better for the company to do it that way, or
    - if the violation was committed to improve performance or to please worker's supervisor
  - **Personal intent:** identify if the Suncor personnel involved in the incident have a history of violations, disregard for LSR rule requirements and safety procedures in general.
- The decision on disciplinary actions for Suncor personnel involved in life saving rule violations determined to be violations should be taken after the incident investigation is completed. The incident owner should consult with the area HR and/or Labour Relations reps to determine the application of actions and/or consequences following local area processes.

## 5 Life Saving Rule Metric

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**Metric**

The following metric should be used as the primary measure of life saving rule violation occurrence within Suncor:

- Life Saving Rule Violation Frequency:
    - Personal safety metric representing the frequency of occurrence of violation to a **main life saving rule requirement**.
    - Calculated as = (Number of life saving rule violation incidents) x 200,000 / (Number of exposure hours)
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## 6 Terms and Definitions

It is recommended to define a unique term in the document where they appear (will make the requirement more usable to the end user)

Term	Definition
<b>Critical safety procedure</b>	A safety critical procedure could include any procedure for a task which, if carried out incorrectly or not at all, could lead to serious injury or fatality (SIF).
<b>Exclusion zone</b>	Exclusion zones should be defined by local area procedures but it refers to areas where workers cannot entered without proper authorization
<b>Fit for duty</b>	Fit for duty means worker is: <ul style="list-style-type: none"> <li>• Physically capable of performing assigned duties</li> <li>• Rested</li> <li>• Mentally and emotionally prepared to work safely</li> <li>• Able to perform assigned duties without limitations due to the use or after-effects of alcohol or drugs</li> </ul>
<b>Hazardous area</b>	For the purpose of this guideline, a hazardous area is defined as an area where the fire or explosion hazards may exist, might occur due to a flammable atmosphere and/or mixture.
<b>Journey management</b>	A journey management plan is a set process of safety steps undertaken as part of a road transport journey, particularly one that involves driving for several hours. The plans are designed to account for and thus reduce the risks associated with driver fatigue, inclement or dangerous road conditions, and other hazards.
<b>Life saving rule violation</b>	Is considered as any deviation of a main rule requirement.
<b>Life saving rule error</b>	Is any life saving rule violation in which the worker or supervisor: <ul style="list-style-type: none"> <li>• Unknowingly acted in a manner contrary to the life saving rule requirements,</li> <li>• Was incapable of successfully executing the work, or</li> <li>• Makes an honest mistake</li> </ul>
<b>Life saving rule erosion of standards</b>	Is any life saving rule violation in which the worker or supervisor knowingly act in a manner contrary to the life saving rule, where: <ul style="list-style-type: none"> <li>• The related policy or procedure is not clear or conflicts with other rules at site, or</li> <li>• Acting in a manner contrary to the rule is an accepted and tolerated practice on site or in the work team</li> </ul>
<b>Line of fire</b>	Line of fire occur when the path of a moving object or the release of hazardous energy intersects with an individual's body



<b>Suncor personnel</b>	Includes directors, officers, employees and independent contractors (formerly referred to as contract workers) of Suncor.
<b>Working at height protected area</b>	Protected areas may include stairs with handrails, approved scaffolds, or any other enclosed and approved area at height where the use of fall protection is not required.
<b>Valid work permit</b>	A permit is considered as valid when: <ul style="list-style-type: none"><li>• Work is performed inside the permit parameters:<ul style="list-style-type: none"><li>○ Date</li><li>○ Time</li><li>○ Location</li><li>○ Scope</li></ul></li><li>• All required work authorizations are obtained prior to work execution</li></ul>

## 7 References

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### Referenced Documents

The following document(s) have been referenced throughout this guideline.

- Incident Management Standard (SUN-00010)
  - Operational Excellence Management System and Process Safety Definitions Document (SUN-00208)
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### External Publications

The following provide external publications that this guideline has been based upon.

- Life saving rules standard – Energy Safety Canada
  - Life saving rules explanation guide – Energy Safety Canada
  - IOGP Life Saving Rules (Report 459) – International Association of Oil & Gas Producers
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The following individuals have approved and signed this document.

Name: Farzhana Shah (fshah)

Title: Dir Central Safety

Date Tuesday, 28 April 2020, 12:03 PM Mountain Time

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