

**Subject line:** Overview of changes to Suncor's A&D Random Testing and Post Incident Testing in the Regional Municipality of Wood Buffalo (RMWB).

**Attachment:** Suncor A&D Random Testing- Contractor FAQs

Hello,

With reference to the email communication on November 29, 2018, subject line: Update on Alcohol and Drug Testing in the Regional Municipality of Wood Buffalo.

Prior to the end of Q1, 2019, Suncor will begin random alcohol and drug testing of employees working in the RMWB who are in safety sensitive or specified positions, in accordance with our Random Testing Standard. Contractors will also be required to conduct random alcohol and drug testing.

In accordance with Suncor's Contractor Alcohol and Drug Standard, **all contractors who deploy workers to Suncor's sites in the RMWB are not only required to have an alcohol and drug policy, but are also required to have a random alcohol and drug testing program in place that meets or exceeds Suncor's requirements for random testing (as outlined in this letter) or the 2014 Canadian Model for Providing a Safe Workplace (as may be updated from time to time), including random alcohol and drug testing.** The requirement for random testing will be formalized in a site specific standard which is currently being finalized by Suncor and will be shared with contractors in the coming weeks.

Contractors will commence testing either on the date on which Suncor commences - i.e. in the latter half of the first quarter of 2019 or the day on which they are permitted to commence testing pursuant to any notice requirements under binding agreements with your workforce.

Contractors must give any required notices to their workforce as soon as possible.

**For immediate action**

**Please confirm the following:**

- 1) receipt of this notice
- 2) your company has a process currently in place to conduct random A&D testing
- 3) Avetta is properly updated with your A&D policy
- 4) any required notices to your workforce will be delivered as soon as possible

Note: above confirmations are to be provided to your Supply Chain contact

Please be advised that there are some changes to how Suncor will be implementing A&D random testing and post-incident testing specific to operating assets in the Regional Municipality of Wood Buffalo (RMWB).

**Overview of changes to A&D Random and Post Incident Testing**

***Oral fluid (swab) testing will be added (in the latter part of Q1 2019) to the process for both post-incident and random testing to determine A&D Program compliance in the RMWB.***

- Only employees in safety sensitive positions and specified positions are subject to random testing.
- Changes to post-incident testing apply to all employees working in the RWMB.
- There will be no changes to how other forms of Drug testing are conducted (e.g. reasonable cause and certification testing)
- Given concerns about its increasing prevalence in society and the safety risks it poses to our worksites, fentanyl will be added to all Suncor drug testing panels.

The following are the alcohol and drug tests which are conducted for random testing and post-incident testing in the RMWB:

Test type	Purpose
<b>Breath alcohol test</b>	To assess if an employee can be returned to work and A&D Program compliance <i>(No change – same as before)</i>
<b>Urine point of collection test (POCT) (urine sample)</b> -A POCT drug test is a urine test that provides an immediate result.	To assess whether an employee can be returned to work following a post-incident or random test <ul style="list-style-type: none"> <li>• A POCT can result in the following outcomes: <ul style="list-style-type: none"> <li>○ a negative urine POCT = employee can be immediately returned to work absent any other fitness for duty concerns (<i>same as before</i>) or</li> <li>○ a non-negative urine POCT = employee is sent home pending oral fluid laboratory confirmation test results (<i>previously pending urinalysis</i>)</li> </ul> </li> </ul>
<b>Oral fluid (swab) laboratory confirmed drug test</b> -analyzes a saliva sample for drugs.	To assess A&D Program compliance <i>(New – previously A&amp;D Program compliance was determined by urine laboratory test )</i>

#### Random testing selection

- 20 per cent of employees in a safety sensitive position or specified position will be tested every calendar year.
  - *Previously 50 per cent of candidates every calendar year.*

#### **Important notes:**

- Urinalysis and oral fluid confirmation test levels are not interchangeable and cannot be directly compared because they involve different bodily samples so they have different thresholds.
- Suncor's current drug testing cut-offs are specific to urinalysis, so oral fluid laboratory confirmation tests will use the COAA (Construction Owners Association of Alberta)

Canadian Model cut offs for all drugs except cannabis/marijuana (THC) or drugs that are not currently included in the COAA Canadian Model (e.g. fentanyl).

- a. Oral fluid cannabis/marijuana (THC) cut offs are:
  - o 5 ng or greater = A&D Program violation;
  - o 2 ng to less than 5 ng = employee held out of service without pay until they have a negative urine POCT (*for employees in safety sensitive or specified positions only*); and
  - o less than 2 ng = employee is return to work with pay.
- iii. Given concerns about its increasing prevalence in society and the safety risks it poses to our worksites, fentanyl will be added to all Suncor drug testing panels.
- iv. Updates to relevant A&D standards will reflect all the noted changes.

In the attached Contractor FAQ document, we have answered questions relating to the changes as noted in this communication, as well as general questions relating to implementation requirements. Please also find attached the Suncor Alcohol and Drug Policy, and the Suncor Contractor Alcohol and Drug Standard for your information.

For more information about random testing, please contact [A&D@suncor.com](mailto:A&D@suncor.com), or contact your Suncor Supply Chain contact.

Thank you for your continued support and prompt action.

Sincerely,

Supplier Engagement



# Memo

<b>To:</b>	TAMS Suncor Firebag	<b>From:</b>	TAMS Management
<b>Date:</b>	February 27, 2019		

## Suncor Random Testing Implementation Notification – April 1, 2019

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Effective April 1, 2019, Suncor will be implementing a Random Alcohol and Drug Testing program for all workers in safety sensitive positions in the Regional Municipality of Wood Buffalo.

### Details:

The TAMS Suncor Firebag team and TAMS Management have been working with Suncor and DriverCheck to implement this program on site for all TAMS Staff, DSP's and craft employees. This program is in accordance with the Canadian Model for Providing a Safe Workplace (Alcohol and Drug Guidelines and Work Rule) and Suncor's Drug and Alcohol Policy.

Each month, employees will be randomly selected by DriverCheck to provide an Oral Fluid Swab test. Employees will be able to immediately return to work and the results of the test will be confirmed within 48-72 hours. All employees must provide a negative oral fluid swab test to ensure continued employability with TAMS on the Suncor Firebag site. TAMS will manage results outside of the Policy with the Business Manager and/or the appropriate referral program.

All other current alcohol and drug testing will remain in effect – this includes current protocols for pre-access, post incident and reasonable cause testing as per the Canadian Model.

To ensure a smooth implementation of this program, an onsite meeting will be held within the next month to provide employees with more information and the opportunity to ask any questions about the program. Details of the meeting will be scheduled and communicated by your Site Management Team.

Thank you for your cooperation.

Sincerely,

TAMS Management & Site Team

February 26, 2019

Via E-Mail  
(or delivered by hand)

MEMORANDUM TO:

*All Local Union Business Managers,  
International Representatives, and  
Affected Employees*

**Re: 30 day notice-implementation of random Alcohol and Drug testing program**

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Dear Sir/Madam:

Suncor has informed Jacobs Industrial Services Ltd that it will be implementing a Random Alcohol and Drug program for all their sites in the Regional Municipality of Wood Buffalo effective March 27, 2019. As a condition of working for Suncor and in order to continue to meet our client's expectations in relation to workplace safety and Operational Excellence this program requires Jacobs Industrial to implement a random Alcohol and Drug program which is specific to safety-sensitive employees at Suncor worksites within the Regional Municipality of Wood Buffalo, Alberta.

In accordance with our Alcohol and Drug Policy Jacobs Industrial is required to provide 30 days notice prior to implementation of a random alcohol and drug program. This letter serves as that notice that effective March 27, 2019 Jacobs Industrial will implement a random testing program. This notice has also been sent to your unions to make them aware.

In compliance with our Alcohol and Drug Policy, testing will be done through a computer generated random alcohol and drug program in accordance with procedures set out in the Canadian Model for providing a Safe Worksite. We will be utilizing a third party to generate this random list to ensure the integrity of the program and no internal influence. Once a month a list will be generated and the employees on that list will be contacted and requested to submit to a test under the same requirements and conditions as other testing as outlined in our Alcohol and Drug Policy.

At this time, we would like to encourage our employees to take advantage of self-referral. Any employee that believes they may require help either through substance abuse experts and/or employee and family assistance programs (EFAP). Jacobs will be support any individual in their requests for help. You can contact your EFAP, Homewood Human Solutions at 1-800-663-1142 directly or ask for help from one of your supervisors or our Labour Relations Team.

All affected employees who choose not to work under our client's revised policy will be granted a layoff provided a written request is made to their supervisor prior to the implementation date. Please be further advised that, after this date, the above-mentioned policy changes shall be deemed accepted by all remaining employees.

# JACOBS

*Jacobs Industrial Services Ltd.*

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For a copy of our Alcohol and Drug Policy or Canadian Model please speak with your supervisor. For any other questions or assistance please contact your Union Steward or any member of our Jacobs Supervision at site.

Sincerely,



**Don Austin**  
Corporate Manager Labour Relations  
Jacobs Industrial Services Ltd.  
Tel: (780) 229-2206

ec: Building Trades of Alberta  
Brett McKenzie

February 26, 2019

The United Association of Plumbers and Pipefitters  
Local Union 488  
16214 118 Avenue  
Edmonton, Alberta  
T5V 1M6

**RE: Random Drug Testing on all Suncor Facilities and Sites in the Regional Municipality of Wood Buffalo**

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Please be advised that in response to Suncor's implementation of Random Alcohol and Drug testing at their facilities and on their sites, Melloy Industrial Services Inc. will be executing random testing on any future Suncor projects in the Wood Buffalo Regional Municipality as of March 27, 2019.

We will be implementing this testing in accordance with our internal Alcohol and Drug Policy, COAA's *Canadian Model*, and the Occupational Health and Safety Pilot Project: Reducing Safety Risks Related to the Use of Alcohol and Other Drugs (known as DARRPP). As such, we are following the steps outlined below:

- a. Confirmation of EFAP programs that cover all our employees;
- b. 30 day prior Notification to Local 488;
- c. 30 day prior Notification to our employees;
- d. Monthly generation of a list of random employees, equal to 4.17% of our total active workforce;
- e. List generated by a third party to eliminate any perceived internal influence;
- f. Testing and follow-up to be conducted as outlined in our internal Alcohol and Drug Policy.

We trust that Local 488 will be supportive of these efforts to provide our employees a safe workplace by reducing the risks associated with the use of alcohol and drugs. We look forward to working collaboratively with Local 488 in resolving any concerns or issues that arise through the implementation of this protocol to keep our employees and your members safe.

Sincerely,

  
John Aitken  
Vice President & General Manager



February 14, 2019

To All Trades affiliated with Babcock & Wilcox Power Generation Group Canada Corp.

**Re: Random Drug & Alcohol Testing at our Client's, Suncor Project Site in the Regional Municipality of Wood Buffalo (RMWB)**

Dear All,

Babcock & Wilcox Power Generation Group Canada Corp. received an email dated February 5, 2019 from Suncor with regards to their decision to implement the Random Drug and Alcohol Testing effective March 27, 2019 in the Municipality of Wood Buffalo. The testing will be mandatory for all employees (temporary or permanent, with leaders who supervise) who are in safety sensitive positions. A Safety-Sensitive Position is defined as a position in which an employee has a key or direct role in an operation where if actions or decisions are not carried out properly could result in a serious incident affecting the health or safety of employees, contractors, customers, the public, or the environment; or an inappropriate response or failure to respond to an emergency or operational situation.

We will abide by Suncor's decision and Section 4.6 of the Canadian Model for Providing a Safe Workplace by:

- Providing a minimum of 30 days prior notice indicating the implementation date and the specific location or locations where random testing will apply.
- Confirming the random drug & alcohol testing program be based on a computer generated randomized selection for the current testing period.
- Confirming all employees are covered by an employee assistance program and the assistance services are available immediately before initiating the test.

We trust that this letter satisfies your concerns and should you have any questions please do not hesitate to contact the undersigned.

Kind Regards,

Remi Chenard,  
General Manager, Western Operations  
Babcock & Wilcox PGG Canada  
Email: [rchenard@babcock.com](mailto:rchenard@babcock.com)  
Phone: (780) 489-0404



# MEMO



*BFI Constructors Ltd.*  
8404 McIntyre Road  
Edmonton, Alberta T6E 6V3  
Phone: (780) 485-2703  
Fax: (780) 485-2704

To: All Alberta Building Trades

cc:

From: BFI Constructors Ltd.

Date February 22, 2019

**Subject:** Random Testing on Suncor Sites- Notice to Building Trades Association

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BFI Constructors Ltd. (BFI) has been instructed by Suncor that random testing will be implemented in Suncor facilities within the Regional Municipality of Wood Buffalo (RMWB). This includes Base Plant, Fort Hills, Firebag, Mackay River, East Tank Farm, Pipelines and regional services.

BFI employees will have the option of signing onto the third party monitored program, or the RSAP program available through the CLR of Alberta. Employee assistance services will be available to the employee through the Construction Employee and Family Assistance Program (CEFAP) detailed at [www.clra.org](http://www.clra.org).

Please consider this your written notice, as per section 4.6 of the *Canadian Model for Providing a Safe Workplace*, that we will be implementing random testing in compliance with the requirements of Appendix A of the *Canadian Model* on all of BFI's Suncor RMWB sites effective March 27<sup>th</sup>, 2019. Refusal to comply will result in removal from site and a ban by the owner from all construction and maintenance operations at Suncor RMWB facilities.

Please forward this notice to all of the affiliated Building Trade partners.

Thank you for your cooperation. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Shawn Campbell', written in a cursive style.

Shawn Campbell  
President and General Manager  
BFI CONSTRUCTORS LTD.



APTIM

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Tel: +1 780 467 2411  
Fax: +1 780 400 0499

2/12/2019

Building Trades of Alberta  
Edmonton Office  
11635 160 Street NW  
Edmonton, AB T5M 3Z3

Attention: Terry Parker  
Executive Director of the Building Trades of Alberta

Subject: Random Drug & Alcohol Testing at Suncor Project Sites in the Wood  
Buffalo Region

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APTIM Services Canada Corp. received email correspondence from Mark Kenney, Manager LR and ER, Regional Services and Information Systems at Suncor Energy Inc, confirming their decision to implement Random Drug and Alcohol Testing in the Regional Municipality of Wood Buffalo, and providing details regarding implementation for contractors, including APTIM.

Suncor will be proceeding with the implementation of random alcohol and drug testing for safety sensitive positions at all of their operating assets in the RMWB in the first quarter of 2019. In accordance with Suncor's Contractor Alcohol and Drug Standard, all contractors who deploy workers to Suncor's sites in the RMWB are required to have an alcohol and drug policy, and a random alcohol and drug testing program in place that meets or exceeds Suncor's Random Testing Standard or the 2014 Canadian Model for Providing a Safe Workplace (as may be updated from time to time).

In response to this decision, APTIM has been working to implement a Random Alcohol & Drug Testing program that meets Suncor's requirements, utilizing the Canadian Model. The testing will be mandatory for all workers who are in a Safety Sensitive position. A Safety Sensitive position will be defined as:

Management has determined that a position has a key or direct role in an operation, and, if actions or decisions are not carried out properly, the result could be:

- i. a serious incident affecting the health or safety of employees, contractors, customers, the public, the environment; or
- ii. an inappropriate response or failure to respond to an emergency or operational situation



APTIM

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Please note: Employees who are required to temporarily relieve in a safety sensitive position and leaders or supervise safety sensitive positions and who may perform the same duties or exercise the same responsibilities are also deemed to hold safety sensitive positions. Union trades are considered safety sensitive positions on APTIM project sites unless specifically exempted.

To ensure that our program meets Suncor's requirements, and in keeping with Section 4.6 of the Canadian Model for Providing a Safe Workplace, APTIM:

- Is, by way of this letter, providing a minimum of 30 days prior notice indicating the implementation date of March 18, 2019 and the specific location or locations where random testing will apply, all Suncor project sites in the Regional Municipality of Wood Buffalo.
- Confirms the random drug & alcohol testing program will be based on a computer generated randomized selection for the current testing period, which will be executed and maintained by a third-party administrator. External certification of the validity and function of this random testing program has been completed and will be made available upon request.
- Can confirm that all employees are covered by an employee assistance program with Cigna Global Health Services, and that the assistance services are available immediately before initiating the test.

We appreciate the cooperation of all building trades moving forward as we all navigate the uncharted territory of random testing. We are committed to ensuring that all persons working on any APTIM project sites, are fit for duty so we can all make it home safely.

Regards,



**JIM BREWER**

Vice President Canadian Operations  
APTIM | Oil, Gas and Chemicals



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