



Alcohol & Drug Program - Contractor Requirements

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Updates Reference Table

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Nov 22, 2024	3.1 – addition of statement relating to the use of cannabis in conjunction with work.	TM
	3.3 – medication section has been changed to reflect the updated version in the main A&D Program document.	TM
	6.0 – definition of “Triggering Incident” has been changed to reflect the updated version in the main A&D Program document.	TM
	Appendix III and IV have been added to the document – A&D testing forms	TM

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1.0 PURPOSE

At NL Hydro, safety is our top priority. We take collective pride in our commitment to ensuring employees, contractors and visitors go home safely each and every day.

We are committed to preventing workplace injury and illness, which is achievable through active safety leadership and open reporting. Our safety culture is built on a foundation of learning and engagement, thus ensuring the safety conversation does not stop at the end of the work day. This commitment, combined with the hazardous nature of the work involved in the electricity industry, and other activities involved in the energy sector, provide the foundation for this Program.

The use of illicit drugs, cannabis or other mood altering substances, and the inappropriate use of alcohol and medications can have serious adverse effects on job performance and can be a threat to the safety and well-being of employees, contractors and members of the public. This statement of Alcohol and Drug Requirements for Contractors is intended to outline in more detail the requirements and expectations associated with alcohol and other drug use for all contractors performing work on our behalf.

2.0 RESPONSIBILITIES

Contractors are encouraged to implement an Alcohol and Drug Policy of their own which meets or exceeds these Requirements, however having their own Policy is not obligatory.

2.1 Contractors

Contractors are required to:

- inform their representatives of the expectations set out in this document;
- ensure that their representatives comply with these requirements and remain free from any adverse performance effects of alcohol and/or other drugs when on NL Hydro business. This includes work being done on or off NL Hydro premises and worksites, or when operating vehicles and/or equipment as part of their work; and
- sign the contractor acknowledgement form.

2.2 Contract Workers

Contract workers assigned to NL Hydro work are required to:

- report fit for work, and remain fit throughout their work day or shift;
- adhere to the fitness for work standards that have been set out below;
- maintain a valid driver’s license if it is a condition of their work, and report any loss or restriction to their license immediately to a NL Hydro representative;
- conduct themselves in an appropriate manner and in full compliance with these requirements while on NL Hydro business, premises, and worksites;
- co-operate with an investigation into a violation including any testing requirements;
- advise a NL Hydro representative of any individual performing NL Hydro work, or who is on NL Hydro premises, who may be in violation of these Requirements; and,
- be aware of these requirements as well as the consequences of a violation.

3.0 REQUIREMENTS

3.1 Illicit Drugs, Drug Paraphernalia, Cannabis and/or Other Mood Altering Substances

The following are prohibited:

- the use, possession, distribution, offering or sale of illicit drugs, cannabis and/or other mood altering substances, and drug paraphernalia;
- reporting for work or being at work while under the influence of illicit drugs, cannabis and/or other mood altering substances; and
- a positive drug test as determined through the testing program.

With respect to the recreational use of cannabis, all contractor workers must refrain from the use of cannabis products for 24 hours **OR LONGER** if impairment persists prior to work at a NL Hydro site.

3.2 Alcohol

The following are prohibited:

- the use, possession, distribution, offering or sale of beverage alcohol;
- reporting to work or remaining at work under the influence of alcohol from any source;
- consumption of any product containing alcohol during the workday or shift including during meals and breaks;
- consumption of alcohol after an incident, or until tested or advised a test is not required; and

- an alcohol test of .04% BAC (Blood Alcohol Content) or greater, as determined through the testing program.

3.3 Medications

Contract workers are required to:

- use all medications, including those that are prescribed and/or over-the-counter, consistent with directions from their doctor or pharmacist and any information provided on the product label. Medications of concern are those that interfere with or may inhibit an employee's fitness for work or ability to perform their job safely and productively;
- investigate (through their doctor or pharmacist) whether a medication can affect their fitness for work, due to potential negative side effects of the medication(s), by advising them of the nature of their job requirements; and
- take appropriate steps to minimize the associated risk of a medication which would include using a safe alternative when available. If the medication will impact performance on the job, the worker needs to notify their Company representative or a NL Hydro representative of the need for modified work. The contractor must take appropriate steps to address any modified work request, including removal from work for safety reasons.

In addition to the above requirements, the following are **prohibited**:

- reporting to work, being at work, or engaging in work, for NL Hydro while being unfit for work due to the use of a medication;
- the possession of prescribed medication without a legally obtained prescription;
- the distribution, offering or sale of prescription medications (trafficking);
- the misuse of medications (e.g. using the medication in a manner other than how it has been prescribed or directed by a prescribing health professional or pharmacist; using someone else's prescription medication; combining medication and alcohol or cannabis use against direction); and
- the use of cannabis for medical purposes in conjunction with NL Hydro work or at any time on NL Hydro premises and worksites.

3.4 Unexpected Call (Callout)

If unexpected circumstances arise where a contract worker is requested to perform unscheduled services while under the influence of alcohol, illicit drugs, cannabis or other mood altering substances, or medications that could impact safe operations,, it is the responsibility of that

individual to declare the situation and/or decline the callout.

4.0 INVESTIGATIONS

4.1 Unfit for Work Investigation- Contractor's Employee, Subcontractor or Agent

NL Hydro reserves the right to require a Contractor to fully investigate a possible violation of these requirements if a contract worker is at work and deemed to be in an unfit condition, including the requirement for a reasonable cause alcohol and drug test. In this situation:

- the NL Hydro representative will disengage the worker from the work, escort the individual to a safe place, and advise the Contractor;
- the Contractor will be expected to investigate the situation to the NL Hydro representative's satisfaction, including conducting a reasonable cause test as appropriate;
- the Contractor must satisfy NL Hydro that there was not a violation of these Requirements, or if the Contractor confirms that a violation has occurred they are required to take the appropriate steps to address the situation and to ensure that no further violations take place.

If testing for alcohol and drugs is required the NL Hydro Reasonable Cause Alcohol and Drug Test Documentation of Basis for Action form ([Appendix IV](#)) must be completed and submitted to the Program Administrator.

4.2 Unfit for Work Investigation – Single or Small Proprietors

If the contract worker is a sole provider or small independent contractor, the individual will be removed from the immediate worksite and an appropriate investigation will be undertaken by a NL Hydro representative following the same procedures for employees, as outlined in the NL Hydro Alcohol and Drug Program. As a part of the investigation process, NL Hydro reserves the right to request an alcohol and drug test at their discretion.

4.3 Incident Investigations

NL Hydro reserves the right to require a contract worker to be tested for alcohol and drugs as part of an investigation into a Triggering Incident. The decision to refer someone or a group of individuals for a test will be made by the NL Hydro representative investigating the incident in consultation with their employer, as appropriate. Any required testing may be through the

contractor's program, provided it meets the requirements set out in [Appendix I](#) of this document - Alcohol and Drug Testing Procedures.

Should there be a delay in collecting a sample because medical attention is required, contract workers to be tested must be advised to provide notification of their release from hospital/clinic, and that they must not consume alcohol, cannabis, or any other substance or product that would impact results until after the test has been completed, or they are advised a test is not required. The only exceptions, if required, are previously prescribed medications (as directed), or medication administered in the treatment of an acute injury resulting from the incident.

If testing for alcohol and drug testing is required the NL Hydro Post Incident Alcohol and Drug Test Documentation of Basis for Action form ([Appendix III](#)) must be completed and submitted to the Program Administrator.

4.4 Site Access Testing

Pre-site access alcohol and drug testing may be required at certain locations as determined by NL Hydro, and must be conducted in accordance with the procedures attached in [Appendix II](#) of this document – Pre-Site Access Testing Requirements. Contract workers will be required to pass a test to gain access to certain sites/facilities, and failure to pass the test means they do not meet the requirements for site access. Contractors will be informed, prior to work beginning if pre-site access testing is required for their workers.

4.5 Failure/Refusal to Test

Failure to report directly for a test, refusal to submit to a test or to agree to disclosure of a test result to the Designated Program Administrator, an attempt to tamper with a test sample, or failure to report an incident which may require testing, are violations of these requirements. Further details on what constitutes a failure/refusal to test are provided in the definition section.

4.6 Access to Testing Services

Minimum standards for the testing program are provided in [Appendix I](#). In situations when testing is required, NL Hydro may allow contractors to utilize the Company's testing services or to independently obtain testing services (following procedures consistent with those set out in this document).

Any contractor utilizing NL Hydro's testing services will be required to sign a waiver indemnifying NL Hydro from any legal liability associated with the provision of testing services. NL Hydro

reserves the right to invoice the contractor for reasonable and customary charges associated with this service.

If a contractor chooses to obtain testing services outside of the services provided by NL Hydro, they must ensure that the workers sign a release form allowing the name of the donor and the test results (positive, negative or tampered) to be released to NL Hydro. Also, if the contractor chooses to utilize the NL Hydro employee testing services the individual being tested must confirm in writing that their results can be released to the NL Hydro Program Administrator.

4.7 Impaired Driving Situations

If required to operate a NL Hydro vehicle, contract workers must report the loss of their driver's license immediately to a NL Hydro representative. They are also required to immediately report an impaired driving charge, or an administrative license suspension to their contract manager or supervisor if it is received while operating a vehicle on behalf of NL Hydro, and to comply with all investigation procedures and consequences.

4.8 Possession of Alcohol or Drugs

NL Hydro reserves the right to conduct investigations when there are reasonable grounds to believe that prohibited substances, devices, and/or products are present on NL Hydro premises or worksites in violation of these requirements and applicable site rules. Individuals involved in this situation will be removed from site and an investigation will be initiated. A contract worker who refuses to submit to an investigation requested by a NL Hydro representative will be removed from the premises.

5.0 CONSEQUENCES OF A VIOLATION

A positive alcohol or drug test, or confirmed refusal to test, are violations of these requirements. Failure of a contract worker to abide by these provisions may result in immediate removal from the worksite and/or disqualification from future contracts. Should NL Hydro permit the contract worker to be reassigned, they will be required to adhere to any conditions governing their return to work as determined by NL Hydro.

Failure of the Contractor or the Contractor's representatives to meet these expectations may be considered a breach of the contract, and may result in triggering penalty clauses under the contract, or suspension or termination of the contract.

6.0 KEY DEFINITIONS

NL Hydro Business refers to all business activities undertaken by contract workers in the course of performing work for NL Hydro, whether conducted on or off NL Hydro premises.

NL Hydro Premises and Worksites includes but is not necessarily restricted to all land, buildings, structures, facilities, work sites, and mobile equipment or vehicles owned, leased or otherwise controlled by NL Hydro for the purpose of conducting NL Hydro business.

NL Hydro Representative refers to the person accountable for a particular facility, department or area including management or supervisory positions who direct others, and/or oversees the work or project.

Contractor refers to any individual or firm engaged by NL Hydro on a contract, sub-contract, or consulting basis, including on-site labour performed under a purchase order without more formal contract documents.

Drug means any substance, including but not limited to alcohol, illicit drugs, medications, cannabis or other mood altering substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of these Requirements, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively and includes:

- 1) Alcohol refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.
- 2) Cannabis means cannabis as defined in the Cannabis Act of Canada and associated regulations, including but not limited to, any product containing Cannabis such as inhaled products, edibles, extracts and topicals.
- 3) Illicit Drug means any drug or substance that is not legally obtainable and use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as cocaine, methamphetamine, etc.)
- 4) Medication refers to a drug obtained legally, either over-the-counter or through a prescription or medical authorization, through a health professional and includes medically authorized cannabis.
- 5) Mood Altering Substance refers to any other drug, product, substance, or material not defined in this Program, whether obtained legally or illegally, the use of which results in cognitive or physical limitations that negatively impact performance on the job and inhibits the ability to perform job duties safely (including but not limited to: cannabis,

mescaline, synthetic marijuana, “bath salts”, doda, khat, solvents, inhalants and other similar products).

Drug Paraphernalia is any personal property that is associated with the use of any drug, chemical, agent, or substance, including a mood altering substance, with the exception of devices used for the administration of a legally prescribed medication. This would also include any product or device that may be used to tamper with a test sample.

Fitness for Work in the context of these requirements means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of alcohol, cannabis, illicit drugs, medications or other mood altering substances.

Refusal to Test includes:

- failure of a Contractor employee to report directly for a test, or refusal to submit to a test;
- failure to provide a valid specimen, in the absence of a physician documented medical condition;
- a confirmed attempt to tamper with a test sample;
- refusal to agree to disclosure of a test result to the company Program Administrator;
- attempting to avoid a test by failing to report involvement in an incident which may require testing or by avoiding participating in an incident investigation;
- failure to advise of release from hospital if testing is delayed for medical reasons;
- failing or refusing to attend a medical evaluation where required under the these requirements;
- any attempt to disrupt the testing process as described in the these requirements.

Triggering Incident – a Triggering Incident is a work related incident where alcohol and drug testing may be required. The following are considered Triggering Incidents:

- a high potential incident with a severity of 5 **or** an overall risk rating of 15 or higher on the Risk Matrix, including any incident (near miss) having the clear potential to meet those risk ratings;
- a fatality;
- a “serious injury” as defined in the Occupational Health and Safety Regulations;
- an environmental incident that is reportable under provincial or federal regulations;
- a vehicle or equipment (e.g. mobile equipment, heavy equipment, off road equipment) incident including incidents:

- resulting in personal injury to any individual requiring medical attention;
 - with a total combined damage exceeding \$2000, and/or requiring a police report to be filed;
 - involving collisions between moving vehicles/equipment; or
 - with collisions involving pedestrians.
- significant loss of company or customer revenues including unplanned power outages or operating events that impact the business. The significance of incidents will be determined by management in consultation with regional safety resources and/or Program Administrator.

APPENDIX I: ALCOHOL AND DRUG TESTING PROCEDURES

Sample collection, testing and reporting of results must be conducted in accordance with standards established by the U.S. Department of Health and Human Services (DHHS) and accepted in Canada, in order to ensure the accuracy and integrity of results. Rigorous sample collection, storage and chain-of-custody procedures must be followed.

- Testing will be conducted in those circumstances outlined under the NL Hydro Alcohol and Drug Requirements for Contractors to determine the presence of the following classes of drugs: cannabinoids, amphetamine/methamphetamine, cocaine, opiates, phencyclidine and alcohol. The testing program will cover alcohol and the specified drugs only. Contractors who wish to test for other substances must do so under their own Policy.
- Alcohol tests must be administered using a calibrated breathalyzer from the U.S. government Conforming Products List with a printout of test results. Only in those situations when a breath analyzer is not readily available can alcohol testing be done with a saliva strip and urine collection or oral fluid collection for analysis in the laboratory.
- All drug tests must be administered by using split sample urine collection for analysis in the lab. A “point of collection” (quick test) urine drug screening test can be administered in reasonable cause and post incident situations provided appropriate adulterant checks are utilized and any result that is not negative is forwarded to a laboratory for confirmation analysis. Any company wanting to use oral fluid testing for drug presence must have prior clearance from the NL Hydro Program Administrator. Point of collection oral fluid testing is not acceptable.
- Collection of urine specimens and administration of alcohol tests must be performed by trained collection agents. In post incident and reasonable cause testing situations, samples will be collected as soon as possible after the triggering incident, but collection attempts will end eight (8) hours after the incident for an alcohol test, and thirty-two (32) hours after the incident for a drug test. Any reason for a delay beyond two hours must be documented and provided to the NL Hydro representative.
- All individuals who are tested are required to sign a form to acknowledge the accuracy of the employee and employer information and authenticity of the specimen(s). They will be given a copy of the Drug Testing Custody and Control Form and the Breath Alcohol Testing Form for their records.

- Urine samples must be analyzed by a fully qualified laboratory accredited by the U.S. Department of Health and Human Services (DHHS) using a two-step process with initial screening by immunoassay and all confirmations being performed by gas chromatography/mass spectrometry (GC/MS). If a point of collection screening device is used, any non-negative result must be forwarded to a DHHS certified laboratory for confirmation analysis.
- Confirmed positive test results must be reviewed by a qualified Medical Review Officer (MRO) who is independent of the laboratory and who will provide the donor an opportunity to discuss the result in an effort to determine whether a positive test could have resulted from the legitimate use of medications or other medical explanations. The individual concerned must be given an opportunity to explain the finding to the MRO who will then determine whether the result will be reported to the company as a negative or a verified positive or adulterated test.
- For the purpose of these requirements, a positive alcohol test is one in which the blood alcohol concentration is at or above .04% BAC.
- A positive urine drug test is one in which the amount of drug in the sample identified by the confirmation test is at or exceeds the cut-off levels noted below which have been established for workplace testing programs throughout North America.

Drug	Screening Test (POCT) Levels (ng/ml* in urine)	Confirmation Test Levels (ng/ml* in urine)
Cannabis	50	15
Cocaine	150	100
Opioids		
Morphine	2000	2000
Codeine	2000	2000
Oxycodone/Oxymorphone	100	100
Hydrocodone/Hydromorphone	300	100
6-acetylmorphine	10	10
Phencyclidine (PCP)	25	25
Amphetamines	500	250
Amphetamines	500	250
Methamphetamines		250
MDMA	500	250
MDA		250

* A ng/ml means nanograms per millilitre. A nanogram is one billionth of a gram. A millilitre is one thousandth of a litre.

- In the case of a non-negative point of collection test for Cannabis, an oral fluid sample will be collected and sent to the laboratory for confirmation testing. A laboratory positive test result for Cannabis is one containing 2 ng/ml or higher of Delta 9-tetrahydrocannabinol (THC) in oral fluid.
- In the case of a verified positive test result of a urine test conducted in accordance with these requirements, the person who has been tested may request the MRO to direct the split sample to be tested by an accredited laboratory of that person's choice within seventy-two (72) hours of receiving their results. Where split samples are not collected, the donor can request that their original sample be reanalyzed. In both cases, associated costs would apply.
- Any positive test result will be considered a violation of these Requirements, whether or not the drugs or alcoholic beverage were actually consumed on NL Hydro business, premises, or worksites. Failure, or refusal, to test is also a violation of the Requirements.
- All test results for individuals directed for testing by a NL Hydro representative using the NL Hydro testing services will be reported directly to the NL Hydro Program Administrator or designate who will communicate the result to the contractor. Contractors using independent testing facilities will be expected to ensure that the workers sign a release form allowing the name of the donor and the test results (positive, negative, tampered) to be released to the NL Hydro Program Administrator(s).
- NL Hydro reserves the right to audit the contractor's testing program to ensure it meets these standards.
- Confidentiality will be maintained except where limited disclosure is necessary for administering Program compliance and related safety, health and performance concerns (e.g. there is deemed to be a potential for risk to self, others or the company or other necessary reason). That is, only the information strictly limited to the level of functionality of a worker may be shared for purposes of determining fitness for work. However, confidentiality is also subject to disclosure as ordered by a court, arbitrator or other administrative tribunal.

APPENDIX II: PRE-SITE ACCESS TESTING REQUIREMENTS

Contractors Requiring Pre-Site Access Testing:

- All unescorted contractors performing on-site work at locations designated as requiring pre-site access testing.
- All unescorted contractors who are returning to the site after an absence of 30 days or more.

Exceptions:

- Contractors who can verify, with documentation, that a negative alcohol and drug test (that is consistent with NL Hydro's testing requirements and procedures) has been conducted within the last thirty (30) days and have not had a non-compliant test result within that timeframe.
- Contractors who have previously completed a negative alcohol and drug test (that is consistent with NL Hydro's testing requirements and procedures), and have remained in continuous employment with the current contract company since the date of that test, and have not had a non-compliant test result in that time. Continuous employment means without termination of employment or lay-off for a period of 30 days or more.
- Contractors will not be required to be tested if present on NL Hydro premises for temporary, short term, day by day access. This would include but is not limited to vendor representatives, visitors, government agents, or consultants that may from time to time access NL Hydro premises for training sessions, visits, tours, inspections or deliveries. These individuals must be escorted at all times while on NL Hydro premises by a NL Hydro representative.

Testing Requirements

- A drug tests must be administered in compliance with the testing standards set out in the NL Hydro Alcohol and Drug Testing Procedures ([Appendix I](#)) using a trained collector and a laboratory that is certified by the U.S. Department of Health and Human Services (DHHS) using procedures consistent with those set out by DHHS. All samples that do not test negative must be reviewed by a Medical Review Officer who is independent of the laboratory and provides the donor with an opportunity to discuss the result.

- Contract companies may use point of collection urine testing (quick tests) for initial screening, provided they are satisfied with the reliability and accuracy of the test results, and that adulteration checks are done at the time of collection. All non-negative tests must be forwarded to a certified laboratory for confirmation. Point of collection oral fluid testing is not acceptable
- The test must conclude that no drug was detected at levels in excess of the limits set out in the NL Hydro Alcohol and Drug Testing Procedures ([Appendix I](#)), and that no evidence of tampering with or substitution of the sample was found.
- The test must be completed and results known before deployment to NL Hydro premises and within the last 30 days unless the individual qualifies for an exception.
- It is the sole responsibility of the contract company to organize, administer, implement and pay for all activities related to the required pre-site access tests performed on its employees and representatives. The contract company must maintain sufficient records to demonstrate compliance to this these Requirements promptly upon request by a NL Hydro representative.
- A positive alcohol test is one in which the blood alcohol concentration (BAC) in the sample identified by the confirmation test is in excess of the limits set out in NL Hydro Alcohol and Drug Testing Procedures ([Appendix I](#)).
- A positive drug test is one in which the amount of drug in the sample identified by the confirmation test is at or exceeds the cut-off levels set out in the NL Hydro Alcohol and Drug Testing Procedures ([Appendix I](#)). A dilute negative test result does not meet the site access testing criteria.

APPENDIX III: NL HYDRO POST-INCIDENT ALCOHOL AND DRUG TEST

DOCUMENTATION OF BASIS FOR ACTION: CONTRACTORS

Triggering Incident? Is the incident considered a Triggering Incident for which a decision on alcohol and drug testing is required. Triggering Incidents include:

- a high potential incident with a severity of 5 **or** an overall risk rating of 15 or higher on the Risk Matrix, including any incident (near miss) having the clear potential to meet those risk ratings;
- a fatality;
- a “serious injury” as defined in the Occupational Health and Safety Regulations;
- an environmental incident that is reportable under provincial or federal regulations;
- a vehicle or equipment (e.g. mobile equipment, heavy equipment, off road equipment) incident including incidents:
 - resulting in personal injury to any individual requiring medical attention;
 - with a total combined damage exceeding \$2000, and/or requiring a police report to be filed;
 - involving collisions between moving vehicles/equipment; or
 - with collisions involving pedestrians.
- an incident resulting in significant loss of company or customer revenues including unplanned power outages or operating events that impacts the business. The significance of incidents will be determined by management in consultation with regional safety resources and/or Program Administrator.

Explain: _____

Other Obvious Factors? As part of the initial investigation, can testing be ruled out because it is clear that structural, environmental or mechanical factors triggered the incident and not human error? If yes, testing is not required but the reasons should be documented below. If no, determine who contributed to the incident. **Explain:** _____

Acts and Omissions Checklist: A yes to any one of these statements will require testing as part of the investigation for each individual identified as contributing to the situation:

- failure to adhere to any standard, practice, process or procedure that it is reasonable to expect the employee to have known and understood.
- failure to use, when required, or used improperly any tools or equipment.
- recognized but failed to address a hazard, or failed to recognize a hazard that would reasonably be expected to be recognized and controlled.
- failure to do everything reasonable and practical to prevent the incident.

Name of employee(s) tested: (use separate form if more than one):

(Print full name, Company Name, Work Site)

Basis for Test Decision: Provide full details to support conclusions in previous sections, including dates, times, locations, names of witnesses (if any), description of events and any other relevant information from the preliminary incident investigation. To the extent that this information is documented in a SWOP report form, make reference to the document number and do not repeat it here. If it was not possible to test the employee, or if a decision not to test was made, document the reasons below. *(Reverse side if necessary)*. _____

Reasons Testing could not be done within timeline:

Project/Contract Manager (or designate):

(Print Full Name)

(Individual consulted)

(Signature)

(Date)

NOTE: A copy of this form must be provided as soon as possible to the Program Administrator.

**APPENDIX IV: NL HYDRO REASONABLE CAUSE ALCOHOL AND DRUG TEST
DOCUMENTATION OF BASIS FOR ACTION - CONTRACTORS**

Employee Name: _____ **Company Name:** _____

Job Title: _____ **Date:** _____

Project/Contract Manager: _____ **Location:** _____

Line of Business/Division/Department: _____

Action and Basis for Decision:

Please provide relevant details, dates, times, locations, names of witnesses (if any) and description of events or patterns of behavior justifying a test. Attach extra pages if necessary. Use the checklist to help articulate your observations.

Project/Contract Manager (or designate):

(Print Full Name)

(Signature)

(Date)

(Individual consulted)

(Date)

NOTE: A copy of this form must be provided as soon as possible to the Program Administrator or designate.