

POLICY NO:	409	TITLE:	Drug and Alcohol Policy
SECTION:	Human Resources		
APPROVAL DATE:	September 4, 2002	REVISION DATE:	May 2, 2023
AUTHORITY:	CEO	REFERENCE:	
PAGE:	1 of 13		

PURPOSE

The purpose of this policy is to create a safe work environment, respect Aquatera's legal obligations, protect Employees, to encourage Employee health and wellness and to ensure everyone is fit for duty. It will also establish Aquatera Utilities Inc. (Aquatera) expectations for appropriate behaviour and the consequences for non-compliance, provide consistent guidelines for all Employees and a means for supporting Employees who are dealing with current or emerging drug or alcohol problems.

SCOPE

1.0 Key elements of Aquatera's alcohol and drug policy

Aquatera's alcohol and drug policy is established:

- (a) To provide a safe workplace for all Employees and those whose safety may be affected by the conduct of Employees, and
- 1.1 To ensure that all Employees are treated fairly and with respect. The use of alcohol and drugs adversely affects the ability of a person to work in a safe manner. Employees at Aquatera workplaces are often working independently or with equipment or material in an environment that poses a threat to the safety of themselves, the workforce, the workplace, the property at the workplace the public and public property if handled without proper care and attention.
- In setting the requirements in the alcohol and drug work rule, it is acknowledged that assessments of risks relating to work activities, equipment and processes may lead to Aquatera adopting more rigorous requirements in relation to the risks faced in particular work.
- This policy will remind Employees of the risks associated with the use of alcohol and other drugs and provide understandable and predictable responses when an Employee's conduct jeopardizes the safety of the workplace.
- 1.2 By developing an alcohol and drug policy, Aquatera promotes:
- (b) The safety and dignity of its Employees,
 - (c) The welfare of its Employees and their families,
 - (d) Protection of the environment, and
 - (e) The best interests of Aquatera, its Shareholders, industry stakeholders and the public.

1.3 **Safety-sensitive and risk-sensitive positions**

The tasks and environments relative to those employed in construction and maintenance work are safety-sensitive/risk-sensitive. The activity of driving for work-related purposes is deemed to be safety-sensitive, whether on or off a work site. All other tasks and environments must be evaluated using **Appendix C or equivalent methodology to identify safety-sensitive/risk-sensitive positions.**

2.0 **Alcohol and drug work rule**

2.1 **An Employee shall not:**

- (a) While at a company workplace or work site, or while on standby/on call use, possess or offer for sale:
 - (i) Alcohol,
 - (ii) Drugs other than those permitted under section 2.2, or
 - (iii) Any product or device that could tamper with any sample for an alcohol or drug test.
- (b) Report to work:
 - (i) With an alcohol level equal to or in excess of 0.04 grams per 210 litres of breath,
 - (ii) With a drug level equal to or in excess of the concentrations of the drugs set out in Appendix A Tables 1 and 2 where a medical review officer has verified the results as a positive test result (e.g. without legitimate medical explanation), or
 - (iii) While the Employee's ability to safely perform their duties is adversely affected because of the use of alcohol and/or drugs, whether prescription drugs or non-prescription drugs, lawful or unlawful.
- (c) Refuse to:
 - (i) Comply with a request made by a representative of Aquatera under section 4.2,
 - (ii) Comply with a request to submit to an alcohol and drug test made under sections 4.3, 4.4 or 4.5, or
- (d) Tamper with a sample for an alcohol or drug test.

2.2 An Employee complies with section 2.1(a) or 2.1(b)(iii) of the alcohol and drug work rule if they are in possession, while at an Aquatera workplace, of a prescription drug prescribed for them or a non- prescription drug and:

- (a) The use of the prescription or non-prescription drug does not adversely affect the Employee's ability to safely perform their duties, and the Employee is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the Employee's physician or pharmacist or the manufacturer of the drug, or
- (b) There are potentially unsafe side effects associated with the use of the prescription or non-prescription drug, and the Employee has notified their supervisor or manager before starting work of any potentially unsafe side effects, and the Employee complies with conditions and limitations set by the Employer respecting the possession and use of the drug before reporting to or being at the company workplace or work site.

3.0 Disclosure of information

The supervisor or manager who has received a notification under section 2.2 may not disclose any information provided under section 2.2 to any person other than a person who needs to know, to discharge a statutory or common-law obligation.

4.0 Implementation of the alcohol and drug work rule

4.0 Education

4.0.1 Aquatera must inform its Employees of the existence of its alcohol and drug policy and take reasonable steps to inform its Employees of:

- (a) The safety risks associated with the use of alcohol and drugs,
- (b) General education and awareness resources,
- (c) The assistance available under an Employee assistance program (EAP), and
- (d) Identify those roles labeled as safety and/or risk sensitive.

4.1 Self-help

4.1.1 This policy encourages Employees who believe they may require the help provided by Substance Abuse Experts (SAEs) and EAPs to voluntarily request that help. An Employee requesting help will not be disciplined unless they:

- (a) Have failed to comply with the alcohol and drug work rule,
- (b) Have been requested to confirm compliance with the alcohol and drug work rule under section 4.2,
- (c) Have been requested to submit to an alcohol and drug work test under section 4.3, or
- (d) Have been involved in an incident referred to in section 4.4.

4.1.2 An Employee who believes that they may be unable to comply with the alcohol and drug work rule must seek help by taking such steps as are necessary to ensure that they present no safety risk to themselves or to others at the workplace, and:

- (a) Contact a qualified SAE or a person responsible for the administration of an EAP, and where such services are not readily available, a medical doctor with knowledge in substance abuse disorders, or
- (b) Inform a family member or friend and asking for assistance in contacting a person responsible for the administration of an EAP, or
- (c) Inform a co-worker, a supervisor or a representative of the company to which the Employee may belong, of their wish to contact a person responsible for the administration of an EAP.

4.1.3 In responding to an Employee's request for help, a co-worker must inform an Aquatera person in authority of the request.

4.1.4 In responding to an Employee's request for help, a supervisor or manager must:

- (a) Take such steps as are necessary to ensure that the Employee is fit for duty and presents no risk to themselves or to others at the company workplace, and
- (b) Inform the Employee of the assistance available under an EAP, and
- (c) Encourage the Employee to utilize an EAP, which may assist the Employee, and
- (d) Inform the Employee that if they fail to utilize the EAP program the Employer may

insist that the Employee submit to any or all of the following:

- (i) A medical assessment conducted by a medical doctor with knowledge in substance abuse disorders,
- (ii) Alcohol and drug testing as set out at intervals determined by the manager in consultation with Human Resources
- (iii) An assessment conducted by an SAE,

and they must provide confirmation to the Employer that they submitted to (i), (ii) and/or (iii) above, and that their failure to submit to (i), (ii) and/or (iii) above may result in the termination of their employment.

4.1.5 A person providing assistance under an EAP in respect to an Employee's use of alcohol and/or drugs, including a case manager, shall advise the Employee that should they become aware of a failure of the Employee to comply with the terms and conditions of a program established to help the Employee and/or that the Employee presents a serious and imminent risk to themselves or to others at the company workplace, they must inform the Employer of the failure to comply with the terms and conditions and/or of the safety risk.

4.1.6 An Employee who receives assistance from the EAP on account of their use of alcohol and drugs must comply with the terms and conditions of any program established to help the Employee as a condition of their continued employment.

4.1.7 An Employee who is at work and has sought assistance or enrolled in an EAP must comply with section 2.0.

4.2 Possession of alcohol and drugs

4.2.1 A supervisor or manager of an Employee who has reasonable grounds to believe the Employee may not be in compliance with section 2.1(a), must request

- (a) That the Employee confirm whether they are in compliance with section 2.1(a), or
- (b) The assistance of appropriate authorities to confirm the Employee's compliance with section 2.1(a).

4.2.2 A supervisor or manager of the Employee must provide to the Employee the reason for the request under section 4.2.1.

4.3 Reasonable grounds testing

4.3.1 If any employee has reasonable grounds to believe that an Employee is or may not be able to work in a safe manner because of the use of alcohol or drugs, then the Employee must inform their supervisor or manager of that employee.

4.3.2 If the supervisor or manager has reasonable grounds to believe that an Employee is or may be unable to work in a safe manner because of the use of alcohol or drugs, then the supervisor or manager of that Employee must request that they submit to alcohol and drug testing under section 4.3.1. A level of management above this supervisor or manager must also be included in the decision in person if immediately available or, if not available in person, by phone.

4.3.3 A supervisor or manager of an Employee must provide to the Employee the reason for the request for testing under section 4.3.2.

4.4 Incident testing

4.4.1 If a supervisor or manager has reasonable grounds to believe that an Employee was involved in an incident, then they may request that the Employee submit to alcohol

and drug testing. A level of management above this supervisor or manager must also be included in the decision in person if immediately available or, if not available in person, by phone.

4.4.2 Any Employee(s) involved in an incident such as being at fault in a motor vehicle incident, an incident that requires medical aid or a higher level of aid as well as any near misses that had the potential to be a serious incident will be required to submit to alcohol and drug testing.

4.4.3 A supervisor or manager of an Employee must provide the Employee with the reason for the request under section 4.4.1.

4.4.4 A supervisor or manager must make a request for alcohol and drug testing as soon as reasonably practicable following an incident.

4.4.5 If the supervisor or manager concludes that there is objective evidence to believe that the use of alcohol or drugs did not contribute to the cause of the incident, then they need not request that the Employee submit to alcohol and drug testing. In this case a level of management above this supervisor or manager must also be included in the decision.

4.5 Pre-employment testing

The Employer will perform pre-employment testing for all safety or risk sensitive positions as identified in Appendix C.

4.6 Requirements for alcohol and drug testing programs

4.6.1 Laboratory standards for testing

Aquatera utilizes ECS Safety, a certified laboratory for their Drug and Alcohol testing. Point of Collection Testing is performed and if there are any non-negative tests identified then the samples are sent to the laboratory for confirmation by the Medical Review Officer (MRO), the results are then only released to Aquatera's Human Resources Manager.

4.6.2 Employee acceptance of alcohol and drug policy

By continuing his or her employment with the Employer the Employee accepts the terms of this alcohol and drug policy and authorizes the laboratory to provide the test results to the Employer or any person with legal authority to require the disclosure of the test results, subject to section 4.6.1. Further, the Employee authorizes the medical review officer or the Employer to provide the test results to a substance abuse expert or program case manager to whom the Employee has been referred under the provisions of this policy.

4.7 Alcohol and drug testing results

4.7.1 Alcohol and drug test results can be negative, positive, refusal to test or cancelled with additional comments as required. A negative test result means the Employee is in compliance, a positive test result means non-compliance, a refusal to test result means non-compliance, and a cancelled test result cannot be relied upon to determine compliance or non-compliance. All test results will be provided in a confidential written report from the medical review officer to the designated Employer representative with explanation and direction when required.

4.7.2 Negative test result

A report from the medical review officer to the designated Employer representative that the Employee's sample produced a negative test result without an advisory means that the Employee complied with section 2.1(b). The designated Employer representative must notify the Employee of the negative test result and that no other steps under the

Employer's alcohol and drug policy will be taken. If a safety advisory is issued by a medical review officer, then a fitness-for-work assessment should be conducted to ensure the safety of the Employee and others at the company workplace, and because there may have been a failure to comply with section 2.2. It may be appropriate to pursue procedures under other policies or take other steps, including a medical assessment, in order to assist the Employee to perform at a satisfactory level.

4.7.3 Positive test result

A confidential written report from the medical review officer to the designated Employer representative that the Employee's sample produced a positive test result means that the Employee failed to comply with section 2.1(b) of the alcohol and drug work rule.

4.7.4 Refusal to test

A confidential written report from the medical review officer to the designated Employer representative that the Employee has refused to test means that the Employee failed to comply with section 2.1(c) of the alcohol and drug work rule.

4.7.5 Cancelled sample

A confidential written report from the medical review officer to the designated Employer representative that the sample is cancelled means that the test cannot be relied upon for the purposes of this alcohol and drug work rule.

4.7.6 Disclosure of results

In order to preserve the confidentiality of test results, the designated Employer representative and any person to whom disclosure is permitted under the Employer's alcohol and drug policy must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under the Employer's application of this alcohol and drug policy.

4.8 Assistance of a representative

4.8.1 When applicable, a representative of a bargaining agent or labour provider of which an Employee is a member and with whom the Employer has a bargaining relationship may assist the Employee with any matter arising under this alcohol and drug policy if the Employee wishes to have the assistance of a representative.

4.8.2 When applicable, a representative of a bargaining agent or labour provider of which an Employee is a member and with whom the Employer has a bargaining relationship, may attend any meeting or discussion that takes place under this alcohol and drug policy if the Employee wishes the representative to attend and the attendance of the representative does not unduly delay the time at which the meeting or discussion takes place.

5.0 Consequences of failure to comply with the alcohol and drug work rule

5.0 Employer responses to violations

The Employer may discipline an Employee who fails to comply with section 2.0. Discipline may include a variety of reasonable measures, up to and including termination for cause. Determination of the appropriate disciplinary measure will depend on the facts of each case, including the nature of the violation, the existence of prior violations, the response to prior corrective programs, the seriousness of the violation, and the objective of deterring any future violations by the Employee or others in the company workplace.

5.1 Violation of section 2.1(b) of the alcohol and drug work rule

5.1.1 Prior to the Employer making a final decision with regard to disciplining or terminating

the employment of an Employee who has failed to comply with section 2.1(b) of the alcohol and drug work rule, the Employer may direct the Employee to and the Employee shall meet with an SAE. The SAE shall make an initial assessment of the Employee and make appropriate recommendations.

The assessment by the SAE shall be applied utilizing the processes and approaches set out in Appendix B. The Employee shall, through the SAE, provide to the Employer a confidential report of his or her initial assessment and recommendations. The Employer then shall make the final decision under section 5.0.

The initial assessment is to be completed as soon as possible, and the report shall be delivered to the Employer within two days of completion of the report. Failure by the Employee to attend the assessment or follow the course of corrective or rehabilitation action may be cause for discipline, up to and including termination of employment. During the period of assessment and corrective rehabilitative programs recommended by the SAE, the Employee shall be deemed to be on unpaid leave.

5.2 Violation of sections 2.1 (a), (c), or (d)

If Aquatera, at its sole discretion, decides to discipline or terminate for cause the employment of an Employee who fails to comply with sections 2.1(a) or (c) or (d) of the alcohol and drug work rule, the Employer shall refer such Employee to an SAE and shall notify the bargaining agent or labour provider, if the Employee has one, of such referral.

6.0 Definitions

In this alcohol and drug policy, the following definitions apply:

- (a) **Alcohol:** Any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.
- (b) **Alcohol and drugs:** Alcohol or drugs or both.
- (c) **Alcohol and drug test:** A test administered in accordance with section 4.2, 4.3, 4.4 or 4.5 of this policy.
- (d) **Alcohol and drug work rule:** The alcohol and drug work rule set out in section 2.0 of this policy.
- (e) **Case manager:** A professional with training, knowledge and experience in case management and substance abuse disorders. The case manager facilitates and confirms compliance with treatment recommendations, and provides supportive and objective case management services, including aftercare and return-to-work conditions recommended by the substance abuse expert, to support the worker and maintain the safety of the worker and those around him or her on a safety-sensitive work site.
- (f) **Company:** A corporation, partnership, sole proprietorship, association, joint venture, trust or organizational group of persons, whether incorporated or not.
- (g) **Company workplace:** Includes all real or personal property, facilities, land, buildings, equipment, containers, vehicles, vessels, boats, and aircraft whether owned, leased or used by the company and wherever it may be located.
- (h) **Drug paraphernalia:** Includes any personal property that is associated with the use of any drug, substance, chemical or agent the possession of which is unlawful in Canada, or the use of which is regulated by legislation such as marijuana/ cannabis.
- (i) **Drugs:** Includes any substance, chemical or agent the use or possession of which is unlawful in Canada or requires a personal prescription or authorization from a licensed treating physician, or the use of which is regulated by legislation such as marijuana/

cannabis, or any other psychoactive substance, and any non-prescription medication lawfully sold in Canada, and drug paraphernalia.

- (j) **Employee:** Any person engaged by an Employer in work on a work site where this policy applies.
- (k) **Employee assistance program (EAP):** Services that are designed to help Employees who are experiencing personal problems such as alcohol and drug abuse. Also includes an Employee and family assistance plan (EFAP).
- (l) **Employer:** A person who is in a direct employment contract relationship with an Employee (including where such Employee is represented by a bargaining agent) and is responsible for the specific direction and control of the work performed by that Employee. Establishing site-access and site-specific requirements do not make an owner an Employer. On any work site where the Employer is not a prime contractor as contemplated by occupational health and safety legislation, this definition of Employer specifically excludes any prime contractor on the work site, including the owner of such work site.
- (m) **Incident:** An occurrence, circumstance, condition or near miss that caused or had the potential to cause damage to person, property, reputation, security or the environment.
- (n) **Laboratory:** A laboratory providing urine- based drug testing services or oral fluid- based testing services. A laboratory providing oral fluid-based drug testing services must ensure that the oral fluid-based testing be performed in such a manner that:
 - Acceptable forensic practices and quality systems are maintained,
 - Specimen validity testing is deployed,
 - Regular independent audits occur, and
 - Proficiency test samples are included.
- (o) **Manager:** Includes team leaders, supervisors and other persons in authority.
- (p) **Medical review officer (MRO):** A licensed physician, currently certified with the American Association of Medical Review Officers or Medical Review Officer Certification Council, with knowledge of substance abuse disorders and the ability to evaluate an Employee's test results, who is responsible for receiving and reviewing laboratory results generated by an Employer's drug testing program and evaluating medical explanations for certain drug test results.
- (q) **Negative test result:** A report from the medical review officer that the Employee who provided the specimen for alcohol and drug testing (laboratory-based) was not in violation of section 2.1(b).
- (r) **Non-prescription drugs:** Drugs that can be lawfully purchased without a prescription including cannabis.
- (s) **Owner:** The person in legal possession of a work site, or their delegate that controls activity on the work site (e.g. another person acting as operator, licensee, lease- holder or prime contractor).
- (t) **Positive test result:** A report from the medical review officer that the Employee who provided a specimen for alcohol and drug testing (laboratory-based) did have an alcohol and drug concentration level equal to or in excess of that set out in section 2.1(b).
- (u) **Prescription drugs:** Drugs that can only be obtained with a prescription from a registered health care professional licensed to prescribe drugs. Prescription drugs must be made out to a specific individual, have a drug identification number and be dispensed by a licensed pharmacist.

- (v) **Reasonable grounds:** Includes information established by the direct observation of the Employee's conduct or other indicators, such as the physical appearance and behaviour of the Employee, the smell associated with the use of alcohol or drugs on his or her person or in the vicinity of his or her person, his or her attendance record or unexplained absences during regular work hours, circumstances surrounding an incident or near miss and the presence of alcohol, drugs or drug paraphernalia in the vicinity of the Employee or the area where the Employee worked.
- (w) **Rehabilitation program:** A program tailored to the needs of an individual, which may include education, counselling and residential care, offered to assist a person to comply with the alcohol and drug work rule.
- (x) **Risk-sensitive position:** A position or class of positions identified by the Employer pursuant to section 1.3 and articulated as per section 1.0, normally remote from a work site but that has authority to direct safety-sensitive Employees or make potentially high-consequence decisions within a hazardous work site, to which this policy shall apply in order to manage the safety risks of breaching the work rule outlined in section 2.0. See also safety-sensitive position.
- (y) **Safety-sensitive position:** A position or class of positions identified by the Employer pursuant to section 1.3 and articulated as per section 1.0, that normally work with a hazardous work site, to which this policy shall apply in order to manage the safety risks of breaching the work rule outlined in section 2.0. See also risk-sensitive position.
- (z) **Substance abuse expert (SAE):** A licensed physician, a licensed or certified social worker, a licensed or certified psychologist, a licensed or certified Employee assistance expert, or an alcohol and drug abuse counsellor. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.
- (aa) **Supervisor:** The person who directs the work of others and may, depending on the nature of the company's structure, include the foreman, general foreman, supervisor, superintendent or team leader.
- (bb) **Tamper:** To alter, meddle, interfere, substitute or change.
- (cc) **Work:** Includes the application of labour and/or trades and professional skills, as well as breaks, meetings and training while at a work site or company workplace.
- (dd) **Work site:** A place at which a person performs work for an owner or Employer.

DISCLAIMER

This document is the property of Aquatera Utilities Inc. for authorized use only and is subject to change at anytime. All users are reminded to exercise due caution, when referencing printed copies or previously downloaded copies, as these are uncontrolled documents and may not accurately reflect what is currently posted.

APPENDIX A
Drug concentration limits

Table 1 Urine drug concentration limits

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/mL	Confirmation concentration equal to or in excess of ng/mL
Marijuana metabolite	50	15
Cocaine metabolite	150	100
Opioids		
- Codeine	2000	2000
- Morphine	2000	2000
- Hydrocodone	300	100
- Hydromorphone	300	100
- Oxycodone	100	100
- Oxymorphone	100	100
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines	500	— 250
- Amphetamine	—	250
- Methamphetamine	— 500	250
- MDMA ¹	—	250
- MDA ²		

Source: U.S. Department of Transportation, Rule 49 CFR Part 40, January 1, 2018.

1. Methylenedioxyamphetamine
2. Methylenedioxyamphetamine

Table 2 Oral fluid drug concentration limits

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/mL	Confirmation concentration equal to or in excess of ng/mL
Marijuana (THC)	4	2
Cocaine metabolite	20	— 8
- Cocaine or Benzoyllecgonine	—	
Opioids	40	— 40
- Codeine	—	40
- Morphine	—	40
- Hydrocodone	—	40
- Hydromorphone	—	40
- Oxycodone	—	40
- Oxymorphone	—	
6-Acetylmorphine	—	4
Phencyclidine	10	10
Amphetamines	50	— 50
- Amphetamine	—	50
- Methamphetamine	—	50
- MDMA ¹	—	50
- MDA ²	—	

Source: COAA and Energy Safety Canada, 2018.

1. Methylenedioxyamphetamine
2. Methylenedioxyamphetamine

APPENDIX B – SUBSTANCE ABUSE EXPERT ASSESSMENTS

The substance abuse expert

The substance abuse expert (SAE) is a person who evaluates the individuals who are seeking to be assessed or who have been referred for an assessment. The SAE is a professional who is qualified to make recommendations regarding the individuals assessed. These recommendations typically involve treatment options such as education, various counselling or inpatient treatment services, follow-up testing, and the overall general conditions of post- assessment care.

The responsibility and function of the SAE is to apply quality and diligence in the assessment process in order to protect the owner's and the company workplace's safety and health. However, the SAE is not an advocate for any stakeholder in the process beyond the mandate of the assessment. The SAE remains impartial and does not advocate for the Employee or Employer.

The SAE has the responsibility to function in his or her role as an evaluator of the client's apparent condition. The qualifications to conduct this assessment extend across several types of disciplines in the mental health and medical community.

All SAEs have one aspect in common. Each is a licensed or certified professional who has met the educational, experiential and competency criteria to be in good standing with a professional agency that governs his or her respective discipline.

The SAE providing the assessment evaluation can be a licensed physician, a licensed or certified social worker, a licensed or certified psychologist, a licensed or certified Employee assistance expert, or an alcohol and drug abuse counsellor as allowed to diagnose within their respective provincial regulated health professionals, who also has experience or a specialization in the field of addiction. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.

The evaluation and assessment

The foundation of sound clinical expertise and well-established standards of practice is the context for each assessment. The evaluation is based on proven and reliable methods of face- to-face clinical interview practices, reliable and valid alcohol and drug abuse assessment tools (also called psychometrics), and quality assurance clinical supervision provided as additional expertise to the SAE. This gives the SAE a consistent level of support for applying his or her clinical abilities toward the best fit and most exact assessment outcome in each particular assessment.

The evaluation can include consultation with a physician specialist in the area of substance use disorders or the medical review officer (MRO) involved with any substance screen results referenced in the assessment. The MRO or medical specialist in substance abuse disorders is contacted only when there is a specific need to discuss the substance screen result per se or if there are potential medical complications involved in a person's history.

The face-to-face interview includes an assessment of all the relevant factors that are known to be essential in the evaluation of individuals with possible substance use disorders. These factors are examined by questions regarding the client's life and family history, employment situation and current mental status. The in-depth interview also explores the individual's alcohol and drug use history. This includes areas such as the substances used and for how long, the episodic trends of substance preferences, emotional and physical characteristics that are considered relevant in substance use, and

other factors that can give a comprehensive clinical understanding of the person.

The evaluation will provide a clear statement of the assessment's outcome (the diagnosis), along with treatment recommendations. The recommendations are the basic outline of a treatment plan. The individual is free to add to the treatment recommendations, however, the treatment recommendations are the conditions required for successful return to safety-sensitive work. Therefore, they are the essential ingredients of care that the individual must successfully complete.

The evaluation process provides a signed confidential report to the stakeholders involved in the assessment. These parties can include the bargaining agent, a case manager and the Employer, as well as the individual assessed if he or she wishes to receive a copy. The SAE report issued to the person assessed does not include the number of unannounced tests.

The post-assessment referral and treatment

As a result of the evaluation and assessment, the SAE will refer the client to the appropriate contact person, program or case manager involved in the next steps for this person's return to work. Formal case management is considered the best practice approach in order to ensure that the recommendations are completed and adhered to as outlined in the SAE assessment report.

The SAE report and any other relevant information necessary for admission to a treatment program can be forwarded to the appropriate contact personnel. This is done only with client consent to do so.

Follow-up treatment for counselling or relapse prevention will be provided by an SAE as identified above and as qualified to provide such treatment.

The follow-up evaluation

The case manager or representative acting in a role that monitors the individual's compliance with the return-to-work process will evaluate the client's compliance with the return-to-work recommendations. The client's compliance will be supported by a written report or personal communication with the respective education and/or treatment program professionals.

The client's ability to successfully demonstrate compliance with the initial treatment recommendations will be determined in a clinically based follow-up contact. Continued monitoring will ensue to ensure ongoing compliance to the SAE recommendations.

In the event that an individual is demonstrating difficulty in maintaining or complying with stated recommendations in the SAE report, a formal review will take place. The review of the new data is conducted in conjunction with the discussions with the individual and/or treatment program or relevant professionals.

Written communication, often in the form of an amended SAE report, will be issued to address the current situation for the individual.

Sometimes, if developments indicate the need, a new assessment will be conducted.

APPENDIX C –
SAFETY and RISK - SENSITIVE POSITIONS

Safety-sensitive and risk-sensitive positions

Safety-sensitive positions are those where the Employee has a key and direct role in an on-site operation where performance limitations (e.g. due to substance use) could result in an incident or near miss with the potential for high consequences (e.g. significant property damage, environmental damage or negative impact to reputation, and/or serious injury or fatalities to workers or the public). No risk-mitigating measures warrant reclassification of these positions – although the likelihood may be reduced, the potential for high consequences still exists.

Risk-sensitive positions are a subset of safety-sensitive positions. They include supervisors, technical experts, etc. who reside off-site but make safety-critical decisions and direct on-site Employees conducting potentially dangerous tasks in potentially dangerous work environments.

Performance limitations (e.g. due to substance use) could result in an incident or near miss as described above. Risk-sensitive positions and individuals should be clearly identified, similar to safety-sensitive positions and individuals.

Table C-1 Summary of Safety and Risk-sensitive Positions and Departments

	Pre-employment testing	Reasonable cause testing	Post incident testing
Safety-sensitive position categories ·DC Operators ·Trades ·WWTP Operators ·Solid Waste Operators ·Labourers ·Maintenance ·Procurement ·Operations Leads	Y	Y	Y
Safety-sensitive Positions/Departments ·DC Assistant Manager ·DC Supervisor ·DC Manager ·Landfill Gas Technician ·Maintenance Supervisor ·Communications Department ·Operations Supervisors ·Process Specialist ·Solid Waste Supervisor ·Treatment Operations Supervisor	Y	Y	Y
Risk-sensitive Positions/Departments ·Account Services Department ·Business Development ·CEO ·CFO ·Communications Department ·COO ·Corporate Projects Manager ·Corporate Secretary ·Engineering Department ·Finance Department ·Human Resources Department ·IT Department ·Safety Department ·Solid Waste Assistant Manager ·Solid Waste Manager ·Technical Services Department ·VP Corporate Services ·Water & Wastewater Operations Manager ·Water & Wastewater Operations Assistant Manager ·Yellowhead Operations Manager	Y	Y	Y