



# CONTRACTOR SAFETY MANAGEMENT

## NPC TRAINING PROGRAM

### STUDENT HANDOUT



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# CONTRACTOR AND SAFETY PROGRAM MANAGEMENT

## *Objectives*

To review Prime Contractor Responsibilities, Safety Management Systems, Internal Responsibilities and Requirements, Management Tools and Documentation Requirements.

Contractors have to be committed to conducting operations in a safe and environmentally safe manner. The key elements to conducting business in this manner are included in the following:

- **General Policy on Health Safety & Environment** – A company’s general policy statement that indicates the focus the Company is going to take in relation to Health and Safety Management, including basic statements on employee and contractor responsibilities and requirements and the requirement for regulatory compliance.
- **Oil Company Safety and Loss Control Program (Safety Program)** – A “manual” that includes the specifics of the General Policy, including policy statements for the key goals or objectives of the Company.
- **Safety Management System** – The overall program implemented by the Company, including the Safety System, Maintenance and Training programs, Worker Competency checks, etc.
- **Industry Guiding Principles for Safety Management** – An industry document that communicates the primary goals of the industry and is an encouragement for all companies within the industry to meet the standards set.
- **Safety Statements and Rules** – Information that is available to all industries in the forms of posters and signs, which indicate the rules that the Company wants to promote.

- **Audit Protocols and Inspections** – An internal and/or external review of the existing systems, which focuses on identifying areas that require improvement, to the pre-set standards. Audits are intended as management system checks; inspections are intended as workplace checks against very specific rules/regulations.

## OWNER RESPONSIBILITIES

- **Maintain the responsibility of a prime contractor** – As indicated in Canadian legislation, the owner is responsible for ensuring that, from a Health and Safety perspective, all rules and standards are maintained on the worksite.
- **Enter into an agreement with a third party to assume responsibility for the Health and Safety on the worksite** – The legislation allows for the transfer of prime contractor responsibilities, but it has to be a formal process, focusing on the due diligence of the transfer.
- **Ensure all personnel comply with legislated acts and regulations** – The Company is required to ensure its workers are knowledgeable about the regulations that apply to their worksite, and that the applicable rules are either known or communicated to all workers on the worksite.
- **Implement a monitoring system to ensure that the safety program is functioning and any necessary changes are made** – Complete inspections (daily, weekly, monthly, etc.) to review the processes occurring on the worksite.
- **Ensure that every employee knows they have the right to refuse to do unsafe work, without fear of reprisal** – Communicate and implement a system for workers to become aware of what unsafe work is, and what to do when unsafe work is identified.
- **The Prime Contractor has to be committed to protecting the Health and Safety of the employees on the worksite.** To continually improve employees' performance they have to:
  - Be assigned with the responsibility for the implementation of the program.
  - Comply with the applicable legal and regulatory requirements.
  - Ensure timely and effective response and follow-up to incidents.
  - Receive appropriate health, safety and environmental training.
  - Remain sensitive to public, government and industry concerns.

## INDUSTRY PRINCIPLES

A Prime Contractor has a responsibility to protect all workers, engaged in its activities, from personal injury and health hazards. To meet its responsibility it should operate under the following guiding principles:

### **Responsibility:**

The operating Company, when acting as Prime Contractor, is responsible for coordination and general supervision of all activities carried out by contractors, sub-contractors, service companies and suppliers. While all parties have a responsibility to promote worker safety, the operating company recognizes its leadership role in promoting worker health and safety on the basis that it has the greatest power to influence worksite situations. It is the responsibility of workers and employers to refuse to perform unsafe work practices.

### **Priority:**

Activities will be conducted on the basis that safety of all personnel is of vital importance, whether an operating company, contractor, sub-contractor, Service Company or supplier employs those personnel.

### **Recognition:**

The process of selecting contractors, sub-contractors, service companies and suppliers, and the administration of contracts, will include recognition and support of good safety performance. All employers will also provide support and recognition based on good safety performance to their employees.

### **Improvement:**

The operating Company, in cooperation with contractors within the industry, will promote methods and practices that have potential for improving safety performance.

## **SAFETY MANAGEMENT SYSTEM**

All supervisory personnel are required to ensure that contracted workers read and acknowledge the worksite safety management system, and are aware of the hazardous areas on the worksite. The reason for this knowledge and communication is to ensure that the workers are aware of the one hazardous control method they are able to implement – Personal Protective Equipment (PPE).

The knowledge and communication are also used to promote the reporting of unsafe equipment, the holding of regular safety meetings and equipment inspections and that all accidents, whether lost time or otherwise, are reported to the worksite supervisor. The process instructs on site employers to:

- Investigate, analyze, submit documentation, and discuss, during safety meetings, all accidents/incidents.
- Ensure that the contractor employees discuss critical or repetitive hazards during safety meetings.
- Ensures the contract employees are identifying, reporting, correcting and recording hazards identified on the site.
- Participate in new employee orientations.
- Requires employers on site to conduct regular tailgate / toolbox meetings, including worksite safety, and submit the minutes.
- Participate in worksite safety meetings.
- Requires employer participation in safety inspection / audits.
- Ensures all worksite emergency safety equipment is easily identifiable to all site personnel.
- Promotes safety awareness on the worksite through leadership by example.

### ***What is the Standard of Due Diligence?***

**Due Diligence** - “That the Company, contractors and workers have taken all reasonable care to protect the well being of employees or co-workers”. Looking at due diligence after an incident has occurred is to use “20-20 hindsight” and see if someone could have completed a task that would have kept the incident from occurring. This is viewed as determining if all the tasks, or steps of a task, that should have been completed, actually have been carried out as completely as a person in a similar position would have carried them out.

**What is the Defense of Due Diligence?** That all reasonable precautions to comply with accepted or known standards were taken in the circumstances.

**What is the Test of Due Diligence?** The documentation of an effective safety program. The documentation includes a written program, that has been implemented, a process to control or eliminate specific hazards identified in the worksite, written safe work procedures, that are understood and followed by workers, and workers who are provided with adequate instruction, training, supervision and discipline to work safely.

### ***Hazard Assessment***

#### **Responsibility**

Hazard assessments require that employers analyze all places and processes, including buildings, structures, grounds, excavations, tools, equipment, work methods and practices, inspection equipment, worksite conditions, employee actions and job procedures for potential hazards. All analysis is completed to identify potential control methods including Safety Program Development and Contractor Selection and Management.

## Scope

Recognizing potential hazards, and taking steps to control them, is a major part of any safety program. **A hazard is any situation with the potential to do injury or damage to people, property or the environment.**

With the development of hazard assessment guidelines, and the implementation of training programs, employees are prepared to identify and assess any necessary process / operating safety information, potential process, operative hazards and overall risk and estimate the likelihood and consequence of each hazard.

The process also encourages workers to identify required safeguards for preventing, detecting or mitigating potential incidents and implements the recommendations for controlling and eliminating the hazards identified. Examples of potential hazards on the worksite include:

- *Location size* - Is adequate spacing available for all the equipment that will be on the location at any one time, and will the size accommodate conflicting tasks (e.g., using flame powered equipment in the immediate vicinity of flammable liquids or vapors)? It is always recommended that spacing of equipment be completed through the use of a tape measure to ensure that “equipment creep” does not occur.
- *Prevailing winds* – Has the equipment placement taken into account the prevailing winds? Has flame-powered equipment been placed in proximity to flammable vapours or liquid due to prevailing winds?
- *Pre-planning* – When pre-planning is taking place, is the potential for conflicting tasks taken into account? Where will equipment be placed on location to ensure that the hazard level of the material/equipment on location takes into account the many services that may be on location at one time? Also, if specialized safety equipment is required on the worksite, will it have priority spacing?

## **Communication of the Hazard(s)**

- Either the district superintendent, engineer or area foreman is to ensure that the necessary emergency response support is available, and that they have communicated the potential hazards on location. The hazards could include, but are not limited to, underground facilities, conflicting operations, special circumstances and management of change. Generally the communication method used is a safety meeting, which can be a pre-project, pre-job tailgate or general meeting.
- Special hazard assessment planning is required when medical emergencies, release(s) of hazardous atmosphere(s), spills or well control problems are realistic possibilities.
- The plan is to be implemented prior to any of the hazardous conditions becoming present, or potentially present, with arrangements made with the appropriate Emergency Services Contacts, Production Foreman Contact and the Corporate Project Coordinator Contact.

For the worksite plan to be implemented successfully, the site supervisor needs to know if the lease can be safely evacuated in an emergency, if effective lease security is available, that emergency personnel and equipment are available and that key corporate staff is available to provide assistance. Once these processes are in place a safety meeting is held to communicate the plan.

To communicate to contractors the Prime Contractor Responsibilities and Safety Management Systems for the worksite relative to hazard assessment information, the Company must have a process for reviewing internal responsibilities and requirements and completing a review of management tools and documentation requirements.

***The worksite supervisor must have clear instructions  
as to when specific safety services are to be on the lease.***

## ***Safety Plan Checklist***

A “Safety Plan Checklist” is one version of a Health and Safety management system for remote, temporary worksites. The checklist is provided to site management to ensure that a consistent, company approved process is used to manage safety on the worksite, and that critical issues are managed to the same level of competency.

The goal of a Safety Plan Checklist is to address the safety management requirements for the worksite and to communicate to contractors the prime contractor’s system of managing Health and Safety on the worksite. This is completed through the use of a checklist that indicates the key areas of concern, with the completed form providing proof that everything “reasonable and practicable” was done on the worksite, including checking the competency of workers for the jobs they are to perform.

### **Site Safety Plan Checklist**

The Safety Plan Checklist can include the following information, but ideally is adapted to each Company’s particular issues and areas of concern.

#### **◆ HAZARD IDENTIFICATION AND ASSESSMENT**

- Identifies the hazard assessment(s) required on the worksite.
- Identifies the equipment inspections/certifications required on the worksite.

#### **◆ EMERGENCY RESPONSE PLANNING**

- Does the system ensure that applicable emergency response plans for worksite and area have been developed?
- Does the system ensure that first aid/emergency services have been provided for workers?

◆ **SAFETY COMMUNICATION**

- Is a system in place to obtain work clearance? This is a documented system of approval for the general work to be completed on the worksite, e.g., re-completion, drilling, etc., and is usually issued by the Company to the supervisor on the worksite.
- Is a system in place to issue work permits? This is a documented system of approval for specific work to be completed on the worksite, e.g., hot work, confined space entry, etc., and is usually issued by the worksite supervisor to specific foremen or senior workers.

◆ **TRAINING REQUIREMENTS - Have the training requirements been identified for the worksite and have the workers completed the training identified?**

- Company (Oil & Contracted) orientation process.
- Other Training - What is applicable to the worksite and the task being completed?

◆ **HEALTH AND SAFETY CONTROLS –The requirement to utilize the controls on the worksite, with the goal of using the hierarchy of controls – Engineered, Administrative, PPE.**

- Personal Protective Equipment (PPE) – Determine the PPE required for the tasks completed at each stage of the project.
- Special Monitoring Equipment – Determine the equipment required, e.g., H<sub>2</sub>S / lower explosive limit (L.E.L.) / O<sub>2</sub> monitors
- Material Safety Data Sheets (M.S.D.S.) Information –Is the most current M.S.D.S. information available for workers, and is the information reviewed on a regular basis?

◆ **ESTABLISH SAFE WORK PROCEDURES – Is the Oil Company providing appropriate work procedures to the worksite, or are the contractors supplying work procedures to the worksite when they start their designated tasks?**

- Contractors' expertise in developing procedures – Company to decide, prior to the onset of the project, whose procedures are to be followed, Oil Company's or Contractors'.
  - Frequency of Work Procedure Analysis by Contractor – Define the frequency for reviewing the work procedures identified, e.g., prior to each task, weekly, monthly, etc.
- ◆ **ENVIRONMENTAL PROTECTION – A process for managing the environmental concerns on the worksite.**
- Storage of Fuel and Chemicals – How are these items to be disposed of?
  - Handling of Waste – Identify the legislated/industry/company standards for disposal, and supply the workers with information about the standards that are to be implemented on the worksite.
- ◆ **PROJECT CONTROL AND ADMINISTRATION - Methods to ensure that the correct documentation is completed and stored for future reference.**
- Reporting Requirements for Incidents
  - Follow-up of Incidents on the Worksite
  - Work Clearance Signed back over to Production Group

**NOTE:** - As with the operator, regulations require that contractors conduct regular inspections of all places of employment, including buildings, structures, grounds, excavations, tools, equipment, work methods and practices and supervisors' inspection equipment, worksite conditions, employee actions, and job procedures. All inspection processes are completed to identify potential hazards including substandard conditions and practices.

# HAZARD IDENTIFICATION AND ASSESSMENT

## Scope:

Do the company and/or the contractor have a process to recognize potential hazards and do they take steps to control them as a major part of their safety program? - Remember, a **hazard is any situation with the potential to do injury or damage to people, property or the environment.**

With the development of guidelines for completing hazard identification and assessments, and the implementation of training programs, the company and the contractor should be prepared to recognize and implement a process to accept the information gathered through each other's programs. The goal on the worksite should also be to avoid duplicating processes, and always to use the highest standard available.

The hazard identification process should identify and assess any internal processes and operating information, report potential process and operative hazards, estimate the likelihood and consequence of each hazard, identify required safeguards for preventing, detecting or mitigating potential incidents, and implement recommendations for controlling and eliminating the hazards identified.

The hazard identification process most commonly is documented through the inspection process, whether the inspection is pre-use on equipment or general worksite observations.

## Inspection Lists include:

|  |                       |
|--|-----------------------|
| • Service/Drilling Rigs                              | • Worksite Conditions |
| • Safety Equipment and Personal Protective Equipment | • Vehicles            |
| • Overhead Lifting Equipment                         | • Training Documents  |
| • Pressure Equipment and Pressure Relief Systems     | • Worker Competency   |

**Hazard Assessment Processes should include the following concepts:**

**Is this a standard Operation?**

- Frequently conducted and well known to all parties
- Clearly defined procedure for carrying out the operation
- Simple in Scope
- Only non-related, non-interfering tasks being carried out at the same time.

What are the known hazards for this operation?

What do you need to do to control or eliminate these known hazards? (i.e. people, materials, written procedures)

Are there any site-specific differences about this job?

Communicate hazards and control measures to affected parties (i.e. site safety meeting)

**Go to Work**

**For the duration of the task, if there is any change to people, equipment, materials, environment, or scope then a reassessment of the hazards must take place**

Use any available engineering and/or site-specific information to assess hazards. Particulars of this Site/Field "Hazard Assessment Review & Action Plan" section of the Wellsite Pre-job Safety Meeting Form

**Frequency**

The inspection information available within safety programs needs to identify who completes the checklist, the documentation of deficiencies identified, assigning responsibility for follow-up, ensuring corrective actions have been completed and the sign-off by responsible personnel.

## ***Communication***

### **Information Exchange**

Communication, amongst all levels of employees, is an essential element in improving safety and environmental performance in a safety program. Proper communication creates an opportunity for management to distribute information and receive the necessary feedback as to how well policies, rules, procedures and other kinds of information are understood.

Communications can be completed using a variety of methods, including training programs, posters and bulletins and meetings. The primary system for communicating changing issues, hazards and procedures on worksites is the Safety Meeting. The meeting held includes Project Kick-Off Meeting, Monthly General Safety Meetings, Pre-Job Meetings and Tailgate Meetings.

The project kick-off is an opportunity for all parties involved in the process/project to discuss the processes that will be used in the project, and the associated hazards and control methods.

The monthly safety meeting - is an opportunity to discuss, with the workers involved in the process/project, changes to the program, refresh training completed prior to the onset of the process/project and discuss issues/incidents that have arisen since the last meeting.

The pre-job meeting - is an opportunity for the job site supervisor and applicable contractor to discuss the procedures that will be utilized to complete the assigned task, the hazards of the task and the associated control methods.

The tailgate meeting – is an opportunity to communicate the procedures, hazards and control methods to all workers on the worksite involved with the task about to be completed. The tailgate is the last, but primary opportunity, for ensuring that all control methods are in place prior to the start of a task, and that all workers understand the procedures that are required to complete the task.

In safety program reviews, the following information about safety meetings should be determined prior to starting a process/project. The information applies to both the Company and the contractor and asks if Company and contractor hold meetings in the relevant circumstances and whether or not the meetings include the appropriate agendas.

◆ **PROJECT KICK-OFF MEETING**

- Regular meeting with contractors
- MONTHLY (MINIMUM) SAFETY MEETINGS
- Documented and attended by all personnel
  - Minutes distributed to personnel not available to attend

◆ **PRE-JOB MEETING**

- Documented and attended by the job supervisor and contractor involved in the task
- Used as information for the hazard assessment process and tailgate meeting

◆ **TAILGATE (PRE-JOB) SAFETY MEETINGS**

- Completed prior to the start of any critical task (excavation, unloading pipe, entering excavation, etc.)
- Completed when a safe work permit is issued
- Completed by any persons who are relevant to / going to be in the vicinity of the task

## **Permit System**

The intent of the permit system is to ensure that all known hazards or operating conditions that may affect safety at the site are understood and all appropriate control measures have been implemented. Work permits and safety meetings are in essence the same processes, with work permits incorporating a defined set of standards that lead the supervisor to identify the hazards associated with the task.

Safety meetings are a loose process that are aimed at non-standard tasks, which rely on the knowledge of the job supervisor and workers' experience to identify the hazards associated with the task to be completed.

Do the company and contractor have/use permits, as a minimum standard for disabling safety devices, hot work, ground disturbance, confined space entry permits and respiratory protection? The permit system can be expanded to meet any process that constitutes an unusual hazard on the worksite.

### **Work Permit**

- Hot work - includes any activity that **may** produce a flame or spark within 25 metres of a flammable material and is prohibited in an atmosphere that exceeds 10% of L.E.L.
- Confined space – is any enclosed or partially enclosed space with restricted access or egress, with a requirement to complete the four main pre-entry requirements including a site-specific entry plan.
- Ground disturbances – within some jurisdictions a requirement exists to complete a permit whenever the ground is intentionally disturbed to a depth greater than 30 centimetres. The main intent is to prevent workers from coming into contact with underground facilities including pipelines, electrical conduit and communication lines.
- When a safety device is removed/disabled – includes circumstances when engineered safety devices are removed/disabled for designated purposes, i.e. disabling crown saver when installing snubbing unit or removal of fan guard to complete maintenance.

## ***Work Procedures***

Detailed work procedures are important to both management and workers. In every jurisdiction, regulations require that safe work procedures be developed, and implemented, where the work to be performed constitutes a hazard to the worker. More importantly, work procedures set guidelines for operating performance and provide reference for training.

*THE KEY TO SUCCESSFUL WORK PROCEDURES IS TO CONTINUALLY ENCOURAGE SAFE AND EFFICIENT WORK PRACTICES.*

## **SHORTCUTS ARE UNACCEPTABLE**

**Examples of required work procedures include:**

- ASBESTOS
- RESPIRATORY PROTECTION
- CONFINED SPACE ENTRY
- SOUR SERVICE (H<sub>2</sub>S)
- OVERHEAD POWER LINES
- TRENCHING
- WORKING ALONE
- USE OF ALL TERRAIN VEHICLES
- CONTRACTOR SPECIFIC PROCEDURES
- FLOW BACK OPERATIONS

To ensure the health and safety of all personnel on location, all hazards need to be assessed and work procedure developed/implemented to eliminate unsafe conditions. A partial example of a procedure is for the flowing of gas/fluid from a well, which includes minimum standards, i.e.:

- Three Head (Minimum O<sub>2</sub>, L.E.L., H<sub>2</sub>S) Electronic Handheld Monitor With Both Audio And Visual Alarms That Provide Continual Monitoring
- Workers on Location to be Trained in the Use and Maintenance of Monitors
- Safe Work Permit
- Pre-Job Safety Meeting Requirements

- APPROPRIATE PPE
- LEASE ACCESS
- EQUIPMENT SPACING
- LOCATION OF RIG TANK
- USUAL WIND DIRECTION
- ADEQUATE LIGHT AND VISIBILITY
- IGNITION SOURCES
- L.E.L. LEVELS

**NOTE: (10% of L.E.L. or less at rig, doghouse, pump, or loading area).** Record readings on work permit in space provided unless L.E.L. is being monitored continuously.

### ***Health and Safety Controls***

Health and Safety controls address general issues in completing tasks on the worksite, but not necessarily directly in conjunction with an activity on the worksite. The following items are suggested items, with each process/project requiring an assessment to determine if the appropriate controls are available for the process/project about to be completed.

#### **◆ Naturally Occurring Radioactive Material (N.O.R.M.)**

- How does it fit into your local area?
- What special work procedures / disposal procedures are implemented locally?

#### **◆ VEHICLE SAFETY**

- How is journey management completed, are personnel allowed to travel freely, in loosely organized convoys or tightly controlled in protected, well-planned convoys.
- Incident investigation, when and how are off-location vehicles incidents to be reported.

◆ **STORAGE AND HANDLING OF HAZARDOUS MATERIALS**

- Is the storage and handling of hazardous materials completed to a set standard?
- Are the containers appropriately marked to help ensure workers are aware of the hazards associated with the container contents?
- Are standards identified for the stacking of materials and the use of secondary containment?

◆ **PROTECTIVE CLOTHING**

- Has the Company/contractor identified a standard for the type of external clothing allowed within the worksite – when/where is fire retardant clothing required?
- Does the Company/contractor prohibit the wearing of synthetic material under fire retardant clothing is prohibited on locations – intended to prevent injuries from the melting of synthetic material to a worker in the case of a flash fire.

◆ **SHOW LEADERSHIP**

- Does the Company/contractor promote the practice of ensuring supervisors lead by example, and expect the workers to meet the standard that they set?
- Does the company/contractor promote work that is to the highest standard available on location?

# INCIDENT INVESTIGATION

Regulations and standards require that incidents be reported, investigated and analyzed to determine corrective actions and prevent recurrence. To assist with this regulation every Company worker and contractor must:

- Immediately report all incidents, and close calls, no matter how small, to the worksite supervisor and assist the worksite supervisor investigate, to determine the risk potential, and then submit reports as required.
- Report serious incidents to the Corporate Health and Safety department immediately, to enable proper reporting to applicable agencies

## *Definitions*

|                      |   |
|----------------------|---|
| <b>LOST TIME_</b>    | Any worker injury in which the injured person is unable to report for duty on his/her next regularly scheduled shift, at any worksite, e.g., broken bones.                                  |
| <b>MEDICAL AID</b>   | A personal injury that results in the employee receiving medical attention more than once for the same injury, but being able to work to some degree (modified work), e.g., sprained ankle. |
| <b>FIRST AID</b>     | Any injury that requires first aid treatment, while the individual continues to perform regular duties, e.g., cut finger.   |
| <b>ENVIRONMENTAL</b> | Release of any hazardous material, from primary containment, into the environment, whether a reportable quantity or not.  |
| <b>VEHICLE</b>       | An incident, that results in damage, at a time when a person has care and control of the vehicle.   |
| <b>EQUIPMENT</b>     | An incident in which equipment is damaged as the result of the event.   |
| <b>MONETARY LOSS</b> | An incident that incurs extra expenses (e.g., down time).   |
| <b>HAZARD I.D.'s</b> | Any event that could have resulted in an injury or property damage if the conditions been slightly different.   |
| <b>PIPELINE</b>      | An incident that specifically involves a section of pipeline that is located in the ground.   |

## RECOMMENDED REFERENCE DOCUMENTS

### Legislation examples include:

- Federal Government
- Local Government
- Boards and Departments
- Energy and Utility Board
- Natural Resources Conservation Board
- Department of Resource Development
- Alberta Environment
- Environmental Appeal Board
- National Energy Board

### *Contractor Operations*

Contractors will comply with government and company safety regulations, and must ensure that their employees and sub-contractors are competent to perform the work safely

### SELECTION

- Serious consideration to be given to past safety performance and membership in industry association.
- All contracts to contain a section on safety, including insurance, workers' compensation and accident history.
- Site supervisor's knowledge of contractors' health & safety program.

### EVALUATION

- Identify pre-placement training requirements.
- Ensure insurance requirements are met.
- Evaluate past work experience
- Evaluate Contractor's Safety Policy and Program.

**FOLLOW-UP**

- Audit for Safety Guideline Compliance
- Occupational Health and Safety Regulation Compliance
- Verify Implementation of Recommendations