



Safety Management System

Contractor Safety Management

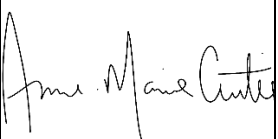
Document Number: D-000OP-0-951-02-006					Total Pages: 24
1	Oct 1, 2026	For Use			
			Matt Seely	Colin Morris	Anne-Marie Curtis
			HSSEQ Lead	Manager, Asset Ops & Maintenance	Sr. Director, Ops
Rev.	Date	Reason for Issue	Originator	Reviewer	Approver

TABLE OF CONTENTS

1. Purpose	3
2. Scope	3
3. Roles and Responsibilities.....	3
3.1. Senior Leadership Team	4
3.2. Manager / Supervisor	4
3.3. Contract Owner (Typically a Manager or Supervisor)	4
3.4. Contractors	6
3.5. Subcontractors	7
3.6. Consultants and Other Contract Professionals	7
3.7. Procurement Team.....	7
3.8. HSE Specialist.....	8
3.9. Employees	8
4. Definitions – Reference Definitions Doc.....	9
5. Training.....	9
6. Policy and Procedures.....	9
6.1. Overview.....	9
6.2. Contract Planning	10
6.3. Contractor Evaluation and Award	12
6.4. Pre-Job Tasks	14
6.5. Job Mobilization and Monitoring	17
7. Related Documents.....	20
8. References	21
9. Appendix 1.....	22
10. Appendix 3.....	24

1. Purpose

The purpose of the Contractor Safety Management Program (CSMP) is to establish a clear approach to contractor safety management across all contractor work activities being completed on behalf of Emera Newfoundland & Labrador (ENL). Implementation will help ensure consistent safe work completion with the goal of preventing SIF from occurring.

This CSMP establishes minimum standards for contractor safety management and provides guidance to employees who oversee and manage contractors to ensure safe completion of contracted work. It establishes clear accountabilities, encourages active engagement of contractors, and provides a consistent and structured approach to contractor safety management.

2. Scope

This Program applies to contractors working for ENL, its operating divisions, and all safety documents and data that form a part of ENL's Safety Management System.

This Program does not apply to:

- Visitors to ENL sites, including regulatory agencies
- Contractors not performing physical work at an ENL workplace
- Contracts issued to provide classroom training & instruction
- Contracts issued for auditing and appraisal services
- Suppliers of tools and equipment unless they are also performing physical work at an ENL workplace

Note: Although this CSMP does not apply to the above groups, any person entering an ENL workplace still needs to have an appropriate understanding of hazards and controls related to the workplace. These individuals should be accompanied by a company representative and/or provided with a visitor orientation that includes but is not limited to, communication methods, required PPE, work area limitations, the emergency response plan, locations of muster points, etc.

3. Roles and Responsibilities

The following personnel and third parties have roles throughout the contract life cycle. Each person must understand their responsibilities at each stage of the contract life cycle and every team member who is overseeing a contractor must be familiar with and follow the requirements of the CSMP.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

All involved have responsibilities to monitor contractor compliance with all applicable federal, provincial, local regulations, and Emera Newfoundland & Labrador SMS, Programs, policies and procedures.

On-going engagement with contractors is critically important to ensure they are familiar with our company programs and overall safety expectations. Periodic meetings with our contractors will provide a forum to:

- Share leading practices, safety updates, regulatory changes
- Review change management process
- Discuss safety risk assessments
- Solicit feedback on communication effectiveness
- Identify potential changes to operational requirements

Note: All personnel, including contract owners, construction inspectors, project engineers, site representatives, etc., have the authority and responsibility to immediately **stop any unsafe work** activities believed to be immediately dangerous to life and health.

3.1. Senior Leadership Team

The Management Team includes, but is not limited to, senior management, leaders of Operations, Special Projects, Safety, etc.

- Take ownership and ensure adequate resources are available for the successful implementation and execution of the CSMP.
- Ensure this program is audited on a regular basis to determine its effectiveness.
- Ensure an overview of the status of this program are included in the Annual Management Review.

3.2. Manager / Supervisor

- Ensure that any work they contract out, or that is completed on their work sites, has a contract owner who is managing the contractor for any aspects they are not completing themselves. (See Contract Owner)

3.3. Contract Owner (Typically a Manager or Supervisor)

For the purposes of this program, the contract owner is the person with the most control over the work to be completed. It may be an Operations Supervisor, a Project Manager, an engineer, or another business leader who is accountable for most aspects of the project. In circumstances where the contract owner is managing more than one contract / contractor, an individual may be designated to

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

assist in managing the work. The use of a designated individual does not remove the responsibility from a contract owner to ensure those items are complete and adequate for their particular project.

Note: A checklist is available, as needed, for the Contract Owner to ensure all aspects are covered, D-000OP-0-951-05-012.

The contract owner has the following general responsibilities throughout the project:

- Act as the main company contact for their contractors.
- Ensure there is strong engagement between ENL and the contractor, and the relationship is maintained.
- Ensure contractors have met all onboarding requirements for the prequalification process. This process may be completed with the assistance of a third party or completed in-house.
- Review the Contractor's Safety Program, safety record, safety manual, and other pertinent documents.
- Identify and document known safety hazards when planning the work and communicate information with the contractor with a specific focus on high-energy hazards as outlined in the SIF Prevention Program.
- Inform the contractor of all special conditions associated with the job and ensure the contractor develops safe work procedures as required.
- Enlist the services of a knowledgeable representative related to the applicable safety requirements (acts, regulations, policies, procedures, and contract specifications) if necessary. This may vary depending on the specific contract.
- Ensure contractors have acceptable training and qualification records for the work, and this is verified prior to commencing work.
- Arrange for general and site-specific orientation, and pre-job meetings with contractors prior to work.
- Conduct pre-job risk review with a focus on the high-energy states and the controls specifically targeted to the high-energy states.
- Ensure effective communication and coordination of work with other contractors and/or ENL representatives on site.
- Conduct formal and informal site inspections/assessments to ensure program requirements are being met by the contractor and subcontractors.
- Arrange and participate in high-risk reviews.
- Ensure contractors performing work abide by ENL's requirements (as set out in the applicable contract) and adhere to the steps and requirements outlined in the site safety job plan.
- Monitor contractor activities and compliance with site safety requirements and procedures.
- Maintain all necessary documentation including discussions with contractors, site activities, and meeting minutes.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- Consult with ENL resources such as, but not limited to, Health, Safety, Legal, Procurement and Environmental departments/representatives as applicable.
- Ensure any alignment concerns (ENL, customer, or regulatory requirements) have been addressed prior to beginning work. Where the alignment concerns do not immediately impact the work, corrective actions may be implemented but must be closed out prior to that phase of work beginning.
- Ensure when changes occur with the scope or specifications of work, where the work may be impacted by Safety or Health requirements which were not originally identified, that the contractor is reevaluated.

Note: Where contractor safety programs, training records, etc. are supplied as part of the contractor safety management process, they should be also validated during safety observations, site visits, auditing, and other ENL interactions.

3.4. Contractors

Contractors and subcontractors are responsible for ensuring that ENL's safety standards are met or exceeded, consistently and without exception. This starts with reviewing the scope of work to identify hazards and propose mitigative measures, including safety training and job site hazard assessments before work begins, and carries on through the execution and completion of the work. Every contractor and subcontractor employee must be familiar with and trained in the requirements of the CSMP.

Contractors are required under their contract with ENL to:

- Adhere to applicable safety requirements according to ENL policies and procedures, contract specifications and applicable regulatory requirements.
- Ensure employees have the appropriate training and qualifications for the specified work, including but not limited to safety, technical, competence evaluations, etc.
- Designate, and provide ENL, a site safety lead who is responsible for ensuring a safe workplace, including effective use of daily safety checklists, JSA's and site-specific hazard mitigation plans.
- Ensure review of high hazard tasks as applicable.
- Participate in all orientations and onboarding activities.
- Identify and document hazards and controls for the contract (e.g., JSA, Risk Assessment, etc.).
- Ensure that any contractor and subcontractor working under their direction are aware of and adhere to the requirements contained within this document and are adequately supervised.
- Disclose all subcontractors and follow the proper approval processes.
- Participate in an ENL general and site orientation prior to the start of work.
- Participate in applicable pre-job safety briefings and all other safety meetings.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- Stop work conducted in an unsafe manner or during unsafe conditions that may present a risk to people, property, or the environment.
- Immediately report injuries, illness, safety incidents, environmental incidents and any OHS regulatory compliance & enforcement activity to the Contract Manager/Administrator and participate in and/or conduct investigations as required.

3.5. Subcontractors

Contractors will frequently utilize one or more subcontractors to complete projects. All requirements applicable to contractors (above) are applicable to subcontractors. While ENL does not contract directly with subcontractors, contractors are required under their contract with ENL to ensure that all subcontractors adhere to all the same processes and applicable laws and follow the applicable SMS safety standards.

No contractor shall subcontract out any portion(s) of their work without ensuring that the subcontractor meets or exceeds the requirements put in place by NSPML and with prior written approval from ENL.

Contractors removed from an ENL worksite are not permitted to be brought back as a sub-contractor under another contractor.

3.6. Consultants and Other Contract Professionals

For certain projects, ENL will engage consultants or other contract professionals to perform certain discrete services (e.g. environmental or technical support, surveying support, safety training). This may be to support ENL personnel who are managing or overseeing the project or performing specific services that are required to complete the project.

All work completed by, or on behalf of the contractor or a consultant, shall follow governing laws, regulations, ordinances, orders, and standards, and ENL policies and procedures. Under the ENL standard form of contract used for projects, ENL has the authority to require contractors or consultants to cease work, as well as the authority to take other actions in the situation, if they do not adhere to their obligations.

3.7. Procurement Team

The Procurement team supports the Contractor Safety Management program and is responsible to administer the Requests for Proposals (RFP)/Request for Quotation (RFQ) process. They are the primary source of communication with the proponents through the procurement process and will support and facilitate the contractor selection. Detailed description of procurement processes and responsibilities can be found in the Procurement Guidelines – D-000-0-950-03-037.

3.8. HSE Specialist

The HSE Specialist or a designate should review safety records and qualifications of the proponents during the proposal process and provide on-site inspections as well as technical guidance throughout project performance including formally assessing contractor's safety programs.

General responsibilities with respect to contractors include:

- Retain copies of completed contractor prequalification forms, documents submitted with the form and any information supplied as part of the evaluation request.
- Manage the contractor evaluation process by bringing in subject matter experts (Safety, Environment, Quality, Electrical, External, etc.) as required.
- Track favorable and unfavorable feedback for contractors as provided through contract evaluations, incidents, observations, inspections, investigations, audits, etc.
- Ensure a copy of the contractor's incident reports, or regulatory interactions, including any immediate or root factors and corrective actions, is obtained from the contractor and that a copy is maintained in Cority or the SharePoint Site under the contractor's name. (Note: names and personal information should be retracted or blanked out or placed on a secure file)
- Monitor and ensure WCB, COR, and any other time-based documents provided by contractors are updated to their file.
- Ensure a contractor who is deemed non-compliant with ENL standards is flagged as not/no longer qualified to complete work for ENL.
- Provide advice and feedback to all levels of employees and management within ENL and approved contractors.
- Assist in monitoring compliance to this Program through periodic safety audits.

3.9. Employees

For the purposes of this Program, an employee is any person involved in the work, the supervision or management of the work, or involved in the contractor management process.

Responsibilities include:

- Report hazards, proactives, and safety issues/infractions regarding contractors to the Contract Owner.
- Eliminate hazards, or establish controls to mitigate hazards, as per the extent of their authority and control.
- Stop work if believed to be unsafe.
- Report hazardous situations outside their authority and control to their immediate supervisor and to those with the ability to correct or mitigate the hazardous situation.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

4. Definitions – Reference Definitions Doc

High Risk Work Activities: Work completed at an ENL worksite that has the potential for significant hazards to people or property unless adequate mitigation measures are in place including but not limited to:

- Confined space entries that require permits
- Welding on pipes or pressure vessels which contain a hazardous or flammable material.
- Welding on structural and support systems
- Trenching and excavation greater than 5' or depth requirements
- Scaffolding that is over 10' high or built around awkward objects
- Hoisting/crane use that is close to capacity of the unit(s), using multiple units, or lifts where weights shift or change during the lift (engineered or special lift considerations)
- Lifts using specialized rigging equipment that would not normally be bought off the shelf
- Live powerline work
- Live Electrical Work
- Concrete pours that are large or difficult to arrange or support
- Companies that are not normally set up in the jurisdiction of work

Other Definitions are located in D-000OP-0-951-06-001 - Definitions

5. Training

ENL will maintain and deliver annual TPRM/CSMP Training for key personnel engaged in contracting and supervising contractors.

General and/or site orientations

Risk assessments to be completed at worksites

6. Policy and Procedures

6.1. Overview

All contractors utilized by ENL as defined in the Scope of this Program are required to follow this program.

HSSEQ Lead, in conjunction with others (OHS, ENV, OPS) will evaluate the safety and training programs of those contractors performing work on behalf of ENL.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- Where evaluations identify the contractor is missing key elements (WCB, Insurance, No Safety Programs, etc.) they may not be used without further steps.
- Use of Contractors with identified issues may be permitted only after:
 - Thorough review by the person hiring the contractor in consultation with the ENL HSE Specialist to determine why the submitted documentation was insufficient.
 - A written corrective action plan is developed by the person hiring the contractor that is deemed appropriate to leadership of the project the contractor is being hired for, AND
 - A Vice President or higher status has signed an exemption request.

Documentation supporting the decision to use or not use; a contractor must be maintained under the contractor's name on the ENL SharePoint Site. CS - (RTN _ recommendation to negotiate)

Contractors are expected to ensure their sub-contractors meet or exceed the requirements set out by this program.

Small Contracts and Agreements

For some small contracts and agreements — such as those with low cost, service type contracts, no on-site work conducted or low risk contracts — it may not be practicable to follow the standard practice of the CSMP. While these smaller contracts may follow different guidelines, consideration should still be given to the requirements used for larger contracts. The contractor classification section in the appendix of this document should be reviewed to ensure high hazard tasks are managed appropriately.

Acceptable deviations will include the requirement for senior management to be aware of and agree to the deviation and include checks and balances to ensure the contractor can complete the work safely.

6.2. Contract Planning

The contract planning stage identifies and defines the scope of the work, determines and evaluates the safety requirements, and develops contract specifications. During this stage an initial assessment of the safety risks shall be done to ensure the appropriate information is incorporated into the contract documents or specifications as well as the overall contract execution strategy. The selection of the contract execution strategy (e.g. the need for an on-site representative, frequency of on-site monitoring/visits, etc.) will be based upon the nature and complexity of the work to be performed.

All contractor work considered specialized or high risk (i.e., Level 4 work involving high-energy states, or work not previously undertaken by the company or undertaken infrequently) shall include, where possible, consultation with a subject matter expert and may include additional oversight involving the subject matter expert.

The following sections summarize the key steps of the contract planning phase.

6.2.1.Scope of Work

For an interaction between ENL and the contractor to be effective, there needs to be a clear understanding of the scope of work to be performed and expectations of both ENL and the contractor. The extent of the documentation and interaction with the contractor will differ depending on the work to be completed and the hazards that exist with the work. Where applicable, documentation should include milestones, reports, deliverables, and end products that are expected to be provided by the contractor, as well as timelines for completion of all deliverables.

When establishing the scope of work, consideration should be given to:

- The description of the job or services to be performed and the required resources,
- The abilities, skills and experience required to perform the work, the availability of contractors, particularly those with highly technical skills,
- The performance expectations of the contractor (HSE, quality, communications, etc.),
- The coordination of work with other contractors and/or operations,
- The time frame and scheduling (e.g. contract schedule, outage schedule, HSE issues and deliverables), and
- The level and type of risk.

6.2.2.Hazard Identification, Evaluation and Control

Communicating HSE hazards to those involved in the contract is an essential aspect of effective job planning. This provides clear direction regarding HSE requirements to contractors which allow them to be prepared to perform the work safely and without environmental harm. Based on the scope of the work, the ENL Contact or designate shall identify the known HSE hazards.

The contractor must, at a minimum, address the hazards identified using a JSA form, or equivalent, as part of their proposal submission.

Note: The JSA is not intended to provide an exhaustive list of hazards and controls and should only be used for guidance. Additional hazard identification and control measures may be required.

When working with multiple contractors, the ENL Contact may identify a general contractor or other responsible party to assist with the coordination of communication for the purpose of ensuring health and safety on the worksite.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

6.2.3. Contract Specifications

HSE requirements are a critical component and shall be identified through a contract or other related safety documents. These documents set the minimum requirements for HSE expectations of contractors and based on the scope of work, any additional requirements are identified. The ENL contact, or designate with specific experience, knowledge and training, may also conduct a site hazard assessment of the intended worksite to help identify the potential HSE hazards associated with the work and site conditions.

Examples of HSE requirements to consider include, but are not limited to:

- Minimum control measures required to eliminate/mitigate specific hazards,
- Certification of their HSE Program,
- A safety representative or safety committee,
- A list of controlled products that are prohibited or limited to the worksite,
- Site-specific information that may be beneficial to communicate during the RFP process,
- Fuel storage and handling (e.g. fuel tank registration and TDG),
- Waste stream management (e.g. approved disposal methods, containment and labeling of waste containers),
- Protection of fish habitat (e.g. silt control), and,
- Spill prevention and response (e.g. spill kits, fuel and waste oil transfers).

Contractors may also be required as part of the contract to designate an appropriate person(s) on site to provide health, safety, and environmental direction particularly if the job involves:

- Large or complex contracts, and/or,
- Work that involves high risk work activities (See Definition Section).

6.3. Contractor Evaluation and Award

Contractors may be evaluated for large projects through a proposal process. Where a contractor is hired to complete work but does not go through a competitive process, they will be evaluated through a pre-approval process. Evaluations are designed to assess contractors to ensure they meet the criteria set out by ENL. Contractors shall meet the ENL Contractor Prequalification requirements, and any additional requirements outlined in site specific, customer or within proposal specifications.

6.3.1. Health, Safety & Environment (HSE) Qualification

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

The HSE qualification process establishes the eligibility requirements for contractors to work for ENL. Contractors are selected based on their HSE management abilities and other key requirements. Contractors must complete D-000OP-0-951-05-013 – Contractor Qualification Form to be considered for work.

6.3.2. Insurance and Workers' Compensation

All contractors are required to provide proof of applicable insurance to ensure they have the financial capacity to address potential liabilities and complete the scope of work as determined by the Contract Owner. Specific insurance requirements will be outlined in contract documents developed for the work. Insurance requirements will be in accordance with the NSPML Guideline on Standard Insurance Requirements developed by Emera Corporate Insurance. A copy of the contractor's insurance certificates indicating limits will be assessed against the proposed work.

Contractors shall also provide proof that they are registered and in good standing with the appropriate Workplace Compensation Board (or equivalent) by providing clearance letter/certificate or other applicable information. Contractors from outside jurisdictions where the work will be completed must provide documentation of registration with the regional workers' compensation board (or equivalent) where the work will take place and a clearance letter/certificate of good standing (or equivalent), if applicable.

6.3.3. Safety and Health Program

An effective Safety and Health Program is an integral part of ensuring a safe workplace. Contractors will be required to have a health and safety program as per the requirements set out in the jurisdiction where they will be working. The program includes planning, safe work practices, monitoring, auditing, and evaluation, and continuous improvement. When evaluating contractors, consideration should be given to additional certifications (i.e., Certificate of Recognition (COR™), or recognized International Standards Organization (ISO 45001 or equivalent). Contractors shall submit a copy of their valid certificate or letter of good standing as part of their submission.

Based on the responses submitted, additional information or documentation may be required.

6.3.4. Drugs and Alcohol

See Emera Alcohol and Drug Policy

See Emera Alcohol & Drug – Statement of Expectations for Contractors

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

See Emera Tobacco – Smoke – Vapor – Free Workplace Policy

6.3.5. Safety Performance

Contractors, dependent on their size, may be asked to provide information and/or documentation to show how they perform with respect to safety. This review will differ depending on the contractor and the type of work they are asked to do, but should include a review of injury statistics that are monitored externally (WCB / OHSA Log) and internal leading and lagging indicators such as proactive (hazard Identified), high potential incidents, injuries, recordable incidents, etc.

6.3.6. Safety Resources

Contractors, dependent on their size, complexity of the work, or size of the project, may be required to have internal safety resources available for, or dedicated to, the worksite. These resources will need to be identified and be agreed upon prior to beginning work.

6.3.7. Risk Matrix Evaluation

Each potential contractor should be categorized based on the information provided in the submission process, previous HSE performance indicators and the type of work to be performed. Through this evaluation process, each contractor will be placed into a category that will assist in determining the level of engagement, including orientations and audits. Guidelines are provided in Appendix 1.

6.4. Pre-Job Tasks

Prior to beginning work, HSE requirements need to be communicated and understood by all parties. Where gaps in expectations are identified, corrective actions can be initiated and completed before the work begins. Communications may vary depending on the complexity and scope of the task; however, there is an expectation that there is an avenue for pre-job interaction as well as points of communication as the work progresses.

6.4.1. Contractor Safety Documentation Submission

The approval to start work may be conditional pending the submission of further documentation within a specified time frame.

Documents may include, but not limited to:

- Contractor's Safety Program (or parts of it as required)
- Site specific Safety Plan

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- Site specific Emergency Response Plan
- Training certificates and qualification records

6.4.2.Subcontractors, Suppliers and Manufacturers

The contractor is responsible for their employees and those involved in the project/site, including subcontractors. All subcontractors must be disclosed to the Contract Owner. ENL reserves the authority to approve or prevent workers, subcontractors, etc. from working on ENL sites or projects. Contractors, sub-contractors, or employees who have been removed from ENL affiliated worksite in the past would typically not receive approval, or if they did it would be under a pre-defined set of conditions.

6.4.3.Notification of Contract

Local regulations may require applications, document submission or other criteria to be met before a contract commences. The Contract Owner shall verify that appropriate requirements have been submitted and, if applicable, approved before execution of the contract.

6.4.4.Pre-Job Meeting

A pre-job meeting shall be held with the Contract Owner, foreman/supervisor, designers, engineers, etc. and the contractor(s) prior to starting work and must be documented.

New contractors and subcontractor personnel who direct the work but did not attend the pre-job meeting must review the pre-job meeting materials and instruction before starting work and sign off as reviewed.

Topics covered during the meeting may include, but not be limited to:

- Safety work plan and requirements.
- High risk work and associated control plan.
- Site specific JSA.
- Authority and responsibilities of various personnel (e.g., on-site representatives, inspectors, managers/supervisors, safety) and Contract Owner.
- Emergency preparedness and response plan.
- Daily pre-job planning prior to arrival onsite to ensure appropriate and sufficient equipment, tools, qualified personnel, and hazard controls are ready for use upon arrival at the jobsite.

During this meeting known hazards for the work are to be communicated between ENL and the contractor and controls for those hazards agreed to by the participants. These discussions may be documented utilizing D-000OP-0-951-05-016 - Owner's Identified Hazards and Controls and maintained on the contractor's file.

Note: Where the contractor is integrated into the worksite with ENL employees, and is following ENL safety requirements, the pre-job meeting may instead take the form of a pre-work risk assessment directly before work begins. If deficiencies are identified during these meetings, they must be corrected prior to beginning work.

6.4.5. General and Site Orientation

Contractors shall participate in general and/or site orientations prior to beginning work with ENL. The extent of the orientations and who is required to attend will depend on the complexity and scope of the work and any related hazards. General orientations provide information on policies and procedures, while the site orientations provide specific onsite information.

For consistency, general orientations should be provided using relevant sections of D-000OP-0-951-05-015 - Contractor Safety Orientation. Focus should be placed on sections that apply to the contractor with a quick awareness overview for those that do not. For contractors who complete multiple projects, a general orientation would not need to be completed for each project, unless the general orientation has changed since the last time it was received. A general orientation refresher does need to be completed if the orientation was updated, the project is over a long duration, etc. **General orientations are only good for one year.**

Site Orientations are more fluid depending on the type and location of work, but provide specific onsite information and includes topics such as, but not limited to:

- Safety objectives and associated safety rules
- Site specific regulations
- Zero tolerance of rules violations
- Work permit requirements
- Right and responsibility to refuse or stop unsafe work
- Pre-work hazard assessment/permitting required
- Specific work site hazards
- Appropriate safe work procedures or practices for the project
- Review of emergency procedures
- First Aid facilities
- Emergency showers, etc.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- Prohibited or restricted areas
- Housekeeping requirements
- General GHS information
- Personal Protective Equipment (PPE)
- Smoking restrictions
- Site specific regulations
- Washrooms
- The potential for occupational exposures (e.g. noise exposure, dust, etc.)
- High-energy states, conditions and locations,
- Presence of wildlife and the procedure to follow if wildlife is encountered
- Any other condition that may be present that could impact workers at the site

The person completing the orientation(s) is required to ensure a record of the orientation is documented and either placed on the SharePoint site or sent to someone designated to do so.

6.5. Job Mobilization and Monitoring

This phase guides the appropriate implementation and communication to relevant parties and ensures work is conducted according to contract specifications.

6.5.1. Work Execution

The contractor may follow their own safety programs if they meet or exceed ENL policies, procedures, standards, and regulatory requirements. If the contractor's procedures do not meet or exceed the expectations of ENL and regulatory requirements, the contractor shall follow ENL policies and procedures or upgrade their own to meet the need of the project; these exceptions shall be reviewed and agreed to as part of the planning, assessment and orientation stages prior to work beginning.

6.5.2. Performance Monitoring

The ENL Contact, or designate, is responsible for monitoring the HSE aspects of the contractor's work activities. The extent of monitoring is influenced by several factors including, but not limited to:

- Scope, complexity, and length of the project.
- The level of risk with the work.
- The geographical location of the work.
- Total number of contractor workers on site.

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- The number of crews and how they are geographically spread out.

Onsite Performance Monitoring

For contracts where the scope of work was determined to have Serious Injury and Fatality Potential, the frequency and depth of the onsite performance monitoring should be determined prior to the start of work.

Monitoring may be completed with the assistance of subject matter experts from within or outside of the organization. In any case, performance monitoring should be tracked (e.g., notebook, observations, field level assessments, etc.) and any positive, or areas for improvement, findings documented in Cority. Where issues are identified, corrective or preventative actions are to be initiated and tracked to completion.

Corrective and preventative actions should have a focus on the contractor improving safety at these sites and beyond. If the contractor is not showing improvements, this information needs to be taken into consideration by escalating the issues, increased monitoring, initiating work stand downs, and in worst case situations by removing the contractor from site.

Monitoring where possible should be documented as observations, inspections, and audits. Any documentation is required to be placed into Cority or SharePoint with corrective actions tracked on Cority as deemed necessary.

Any act or condition that is an immediate risk to the health and safety of workers, or the public shall result in the immediate halt of work until the risk has been mitigated.

Guidelines for performance monitoring are included in Appendix 2, Life Cycle Monitoring.

Offsite Performance Monitoring (Records Review)

All contractors are required to maintain safety records and provide regular updates as part of their contract. These records may vary, depending on the project, and will include both leading and lagging indicators.

Performance monitoring at this level includes reviews of records, including but not limited to, injury stats, documented safety meetings, inspections of work areas, and job observations to name a few. These records are produced as a result of the contractors' work and will make up part of the ongoing performance monitoring by the contract owner or an appropriate designate.

The expectation is that this review should provide supporting evidence that the contractor is self-monitoring and reacting to safety issues that arise. Where major deficiencies, hazardous acts, or

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

conditions of an immediate risk to the health and safety of workers or the public are noted, work shall be stopped until the risk has been mitigated.

6.5.3. Incident Reporting – Refer to Incident Management and Investigation Element, D-000OP-0-951-02-009

6.5.4. Communication and Coordination

Efficient and accurate communication and coordination are essential for each stage of the contract, and the work being done to ensure plans, hazards and controls are known by all involved or affected. Consideration should be given to the following, but not limited to:

- Risk Assessment: Tasks or changes to tasks need to be reviewed, assessed and documented by all on-site. The assessment includes site hazards, job hazards, conditions, competence of those working on site, hazard controls, etc. As conditions, scope of work or procedures change, the Risk Assessment will be revisited, reviewed, and signed off on by the workers.
- Coordination and communication plans: Access to sites, coordination of work and information, and the various types of communication need to be considered to ensure the safety and security of workers, the public, and the site.
- Documentation and Records: Those involved in the contract need to ensure they have the appropriate documentation for the site, work being done, contract requirements, and other appropriate documentation. This includes, but is not limited to, SDS, OHS Policy, Acts and Regulations, emergency response plans, work plan, utility locates, contact information, etc.

6.5.5. HSE Non-Compliance

Noncompliance with regulatory requirements, ENL policies or procedures is subject to corrective action. Corrective action will be appropriate to the nature and seriousness of the issue, previous violations, and any extenuating circumstances. Actions will normally take a stepped approach that includes but is not limited to; coaching, warnings (verbal and/or written), suspension and/or termination. Corrective actions can skip steps based on the issue and may lead directly to termination. Noncompliance and corrective actions are handled on a case-by-case basis.

6.5.6. Contract Changes

Any significant change to a contract requires a review to ensure that the HSE impacts of the change are considered. This review shall include the contractor, ENL Contact or designate, and any other applicable personnel. Contract Completion / Annual Evaluation

Upon completion of a contract, a review needs to be completed to ensure the contract specifications have been fulfilled, and the performance of the contractor has been evaluated. Consideration should be given to quality, HSE, execution, contract management, and any other appropriate criteria.

Annual reviews for multi-year agreements will take place typically in Q1 or in accordance with the contract timeline.

Completion of project and annual review records will be maintained on the SharePoint site or as part of the Cority system. These evaluations should be considered when awarding future work with ENL and when completing the evaluation matrix for the next project.

6.5.7. Demobilization

Upon completion of the work, the ENL Contact or designate shall ensure the worksite is inspected to verify the contract conditions have been met, all required work and documentation has been completed, materials have been returned if applicable, any unsafe or environmentally hazardous conditions have been rectified, and the site has been properly cleaned up and materials disposed of. Any hazards identified in the inspection that cannot be immediately controlled shall be identified and corrective actions assigned.

6.5.8. Contract Evaluation and Close Out

The completion date is defined as when all contract activities have been completed, including demobilization from site, closing of correcting of deficiencies, etc. At the end of a contract, the HSE lead shall perform a contract evaluation to assess the contractor's HSE performance. The evaluation also provides the contractor with the opportunity to provide feedback to ENL to allow ENL to continuously improve its processes. The documented evaluation is to be documented using D-000OP-0-951-05-014 - Contractor Evaluation Form and be accessible for future contracts and proponent evaluations.

7. Related Documents

- D-000OP-0-951-05-012 - Contract Owner Checklist
- D-000OP-0-951-05-013 - Contractor Qualification Form
- D-000OP-0-951-05-015 - Contractor Safety Orientation

Copies are uncontrolled unless otherwise indicated. Verify latest revision before use.

- D-000OP-0-951-05-016 - Owner's Identified Hazards and Controls
- D-000OP-0-951-06-001 - Definitions
- D-000OP-0-951-05-001 – Safety Job Observation Form
- D-000OP-0-951-05-014 - Contractor Evaluation Form

8. References

- Appendix 1 - Guide to Contractor Classification

9. Appendix 1

Guide to Contract Classification

Note: The classification process and follow-through shown below are to be used as a guideline when working with contractors. The actual classification and follow-through may differ based on the evaluation when the contractor is hired for work.

	Criteria	Examples
Level 4 VERY HIGH RISK	Includes, but is not limited to large capital / complex projects or work defined as very high risk.	• Diving • Blasting • Direct work on high voltage, energized equipment • Working on a tower • Hot Work on Natural Gas piping or oil containing piping. • Hot tapping gas pipelines (trans or distribution) • Saddle branch Heat or Electrofusion welding on PE active pipelines • Leak Repair activities • Compressor station maintenance/ engine swings etc. • Boring / HDD drilling activities
Level 3 HIGH RISK	Work with high or very high hazards or exposure but for less complex projects, and low risk work in a high risk environment.	• Work on or near high voltage and/or energized equipment (tree trimmers, work on streetlights, etc.) • Mowing/snow clearing around energized equipment (e.g., at a substation) • Chiller system or aqueous ammonia work • Scaffolding inside a HRSG • Live electrical work • Inline inspection tool operators • Installation of new distribution gas system prior to placing in service • Use of flare stack • Pigging – cleaning
Level 2 MODERATE RISK	Work on mid-sized contracts with medium to high risk.	• Work on roofs • Climbing ladders • Crawling through attic spaces • Direct Assessment work on pipelines • Providing gas compliance services, such as leak surveys / CP readings • Engineering or design work of gas facilities • Leak detection survey • Comprehensive pipeline or aerial patrol • Work with odourants (e.g., Mercaptan)

	Criteria	Examples
Level 1 LOW RISK	Work involving small/simple contracts with low to medium risk.	• Cleaning services • Landscaping • Portable toilet providers • Environmental and / or land survey personnel performing field work • Compressor overhaul • Inspections
Service Providers (Level 0) MINIMAL RISK	Includes, but is not limited to contractors who work from their own premises (garage, print shop, etc.) with no site work and service providers.	• Delivery / service-catering • Software providers • Environmental contractors preparing reports from their offices

10. Appendix 3

