



COUNTY OF NORTHERN LIGHTS

POLICY

ALCOHOL & DRUG POLICY

CREATED: 2/9/2025

REVISED: 4/29/2025

TOTAL PAGES: 10

INTRODUCTION

County of Northern Lights is fully committed to ensuring and maintaining a safe and healthy work environment for all employees, consultants, contractors, and any other personnel engaged in its operations (hereinafter referred to collectively as "workers"). The unauthorized use of illicit drugs, alcohol, or the misuse of medications and other controlled or uncontrolled substances can result in significant adverse consequences, including but not limited to compromising the safety and well-being of workers, endangering the public, causing harm to the environment, and undermining the integrity and operational effectiveness of the Company's facilities, equipment, and assets. In recognition of these risks, the Company enforces a strict Alcohol and Drug Policy, which all workers are expected to fully comply with, without exception.

As part of this commitment, all workers must be fit for duty. Workers shall not be permitted to be present at the workplace with any alcohol in their system or with any detectable level of drugs in their body, except where such drugs have been lawfully prescribed by a licensed medical practitioner or over the counter. In such instances, it is the worker's responsibility to disclose drug use (prescription or nonprescription) that may impair the worker's fitness for duty to the HR Representative, Supervisor, or Health and Safety Coordinator prior to the work shift. This requirement is further governed by the standards set forth in the Construction Owners Association of Alberta (COAA) Alcohol and Drug Guidelines and Work Rule (as referenced in Appendix A). The disclosure of drug use/ possession is not subject to disciplinary action and is confidential.

PURPOSE

The procedures outlined in this document regarding drug and alcohol testing for workers in safety-sensitive positions are designed to achieve the following objectives:

1. **Ensure Fitness for Duty:** The primary goal is to ensure that all individuals performing work in safety-sensitive roles are both physically and mentally capable of executing their assigned tasks safely and effectively. This helps maintain a secure work environment and reduces the risk of accidents or incidents arising from impairment.
2. **Provide Clear Guidance for Supervisors:** These procedures offer explicit guidance to worksite supervisors overseeing worker. Supervisors are equipped with the necessary tools and instructions to accurately assess when testing is warranted, initiate the testing process, and appropriately manage any issues related to alcohol or drug use. This ensures consistency and compliance with the company's Alcohol and Drug Policy and relevant regulatory standards.
3. **Deter Impairment:** The implementation of these testing protocols serves as a deterrent to the consumption of alcohol, drugs, or other substances that could compromise judgment, diminish work performance, or endanger the safety of the worker and others. The intention is to foster a culture of safety and responsibility throughout the workforce, particularly in high-risk roles.

SCOPE

This protocol applies to all workers. It establishes the minimum requirements for drug and alcohol use in the workplace; however, it is important to recognize that clients and specific operational sites may impose additional policies and procedures that go beyond the provisions outlined in this protocol. In such cases, all personnel, including employees, consultants, and contractors, are required to comply with the applicable policies and procedures at those sites, in addition to the standards set forth herein.



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TERMS AND DEFINITIONS

Fit for Work

"Fit for work" refers to a worker's ability to perform their assigned duties and responsibilities safely and effectively, without limitations due to the presence of alcohol or detectable levels of any drugs in their body.

Reasonable Grounds Testing

Reasonable grounds testing is implemented when an individual's actions, appearance, or conduct while at work provide sufficient cause to suspect the use of alcohol or drugs. Such testing is necessary where it is reasonably believed that a worker's performance is, or may be, adversely affected using drugs or alcohol. In such cases, testing may be initiated in accordance with this protocol.

When a supervisor has reasonable grounds to believe that a worker may be impaired, they are required to involve a second management-level employee present on-site to corroborate the assessment of the worker's actions, appearance, or conduct. Supervisors are trained to identify impairment and are instructed on the appropriate steps to take in response to potential substance use.

The decision to refer an individual for reasonable grounds testing will be based on the following observable criteria, which include but are not limited to:

- Consumption, or evidence of consumption, of alcohol
- Use, or evidence of use, of drugs
- Noticeable changes in job performance
- Erratic, atypical, or altered behavior
- Significant changes in physical appearance
- Altered or unusual speech patterns

The supervisor and second management-level employee responsible for informing the individual that reasonable grounds exist for drug and alcohol testing must clearly cite this protocol and provide the individual with specific reasons for the testing requirement. Full written documentation is mandatory in every case, and the rationale for the decision to require testing must be thoroughly documented as soon as practicable following the referral for testing.

Timeliness of Testing

Once the determination has been made that reasonable grounds for testing exist, the test must be conducted as soon as reasonably practicable, ideally within two hours of the decision. If, for any reason, the test cannot be conducted within four hours of the determination, both the supervisor and the second management-level employee must provide a valid and documented explanation for the delay.

Reasonable grounds testing is a critical tool in maintaining workplace safety, ensuring that any potential impairment is swiftly addressed, and mitigating risks associated with the operation of safety-sensitive roles. This protocol is to be adhered to strictly to ensure compliance with company policies and legal obligations.

Post Incident Testing

Post-incident testing will be conducted as part of a comprehensive investigation into any work-related incident or close call involving a Serious Incident & Fatality. This testing may also be required, at management's discretion, in cases where the behavior of the individual involved cannot be ruled out as a potential contributing factor to the incident. In instances of close calls or less serious incidents where there was a potential for more serious consequences, post-incident testing may still be warranted.

Individuals identified by their supervisor and a second management-level employee as being directly involved in the sequence of actions or omissions leading up to a work-related incident or close call may be directed to undergo testing as part of the incident investigation.



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Discretionary Testing

At the discretion of management, post-incident testing may also be required for less serious incidents or close calls if there was a potential for more severe consequences. Individuals who are determined to be directly involved in the chain of acts or omissions that led to such incidents or close calls may be subjected to testing during the investigation process.

Testing Protocols:

- **Drug and Alcohol Testing:** Testing should be conducted as promptly as possible following the incident, ideally within two hours but no later than eight hours after the incident. If alcohol testing is not feasible, the supervisor and the second management-level employee must provide a valid and documented explanation for the failure to conduct the test.
- **Non-Negative Test Results:** A non-negative drug or alcohol test result must always be verified by a certified laboratory in Canada. A lab-based confirmation test is required to determine the final result and ensure the accuracy and reliability of the testing process. This step is essential to differentiate between preliminary non-negative results and confirmed positive findings.
- **Consumption Restrictions:** Any individual subject to post-incident testing is prohibited from consuming alcohol or using drugs, except for prescribed medications taken in accordance with the prescription, until the test has been completed or they have been informed that testing is not required.
- **Chain of Custody:** A strict chain of custody must be maintained throughout the testing process. The individual being tested must remain under the supervision of the appropriate stakeholder (such as a supervisor, healthcare professional, or alcohol and drug technician) from the time of referral for testing until the testing is complete, ensuring the integrity of the process.

Prescription Medications

Workers are only permitted to possess medications that have been legally obtained through a valid prescription issued by a licensed medical professional. Workers who are in possession of any such prescription medication must disclose this to their HR Representative, Supervisor, or Health and Safety Coordinator in accordance with this protocol, if there is a possibility of the worker being unfit for duty (i.e. drowsiness, blurred visions, etc.). Failure to provide the required disclosure regarding possession of prescription medications constitutes a breach of this protocol and may result in the worker's removal from the worksite.

Any worker found to be in possession of substances regulated under the Controlled Drugs and Substances Act (Canada), or any subsequent amendments to the Act, without a valid prescription will be immediately removed from the worksite.

Workers who are taking prescription medications that may impair their ability to safely and effectively perform their job duties (e.g., driving, operating heavy machinery, or other safety-sensitive tasks) must promptly inform their supervisors. In such cases, the worker may be required to provide a clearance letter from their prescribing physician, confirming their fitness to perform the duties required while taking the prescribed medication. This precaution ensures that safety standards are maintained, and any potential risks to the worker or others are appropriately managed.

Additionally, workers taking non-prescription medications that could impair their job performance must also inform their supervisors to ensure the necessary precautions are taken.

Post-Violation or Post-Treatment Return-to Work/Follow-Up Testing

Following a violation of the Company's Alcohol and Drug Policy, or upon completion of a treatment program for substance use, employees may be subject to a monitoring program that includes drug and alcohol testing as a condition for returning to work. This testing requirement is determined on a case-by-case basis and is intended to ensure ongoing compliance with the Company's safety standards.



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Typically, the employee will be required to pass an alcohol or drug test prior to their return to work. Additionally, the employee must adhere to County of Northern Lights Alcohol and Drug Policy, which may include random drug and alcohol testing over a specified period, as agreed upon in the return-to-work conditions. The purpose of these follow-up tests is to monitor the employee's continued compliance and to support a safe and substance-free workplace.

Searches of Company Property

Management reserves the right to conduct searches of any company-owned or contracted premises to ensure these areas remain free of alcohol and illicit drugs. Such searches may also be part of an investigation into potential policy violations or incidents. All applicants, workers, and visitors may be required to cooperate in workplace inspections. These inspections may include, but are not limited to, searches of:

- Work areas
- Personal vehicles (owned or leased) located on company property
- Personal belongings located on or within company property
- Company-owned or provided property, such as dorm rooms, lockers, clothing, and company vehicles, that could potentially conceal alcohol, illicit drugs, or drug paraphernalia

Workers found in possession of prohibited items, or those who refuse to cooperate with such inspections, may face immediate disciplinary action, up to and including termination of employment

Refusal to Test

Company Employees

No drug or alcohol test will be conducted, and no testing will be performed on any sample obtained, without the prior written consent of the employee, as documented in the form attached at Appendix B. However, an employee's refusal to submit to a required drug or alcohol test, as mandated by this protocol, will be considered an act of insubordination and will subject the employee to disciplinary action, up to and including termination for cause.

Consultants and Contractors

The Company expects that its consultants and contractors will obtain the prior written consent of their employees who are required to undergo testing in accordance with this protocol. Management will not permit any consultant, contractor, or their employees to perform work unless they have successfully passed the required drug and alcohol test as outlined in this protocol.

Grounds for Refusal to Test

The following actions are considered a refusal to test and will result in the withdrawal of an employment offer to an applicant or, for employees, disciplinary action up to and including termination for cause. In the case of contractors or consultants, these actions will result in removal from the worksite:

- Failure to report for or attempts to delay reporting for a test
- Attempts to delay participation in testing or outright refusal to submit to testing
- Refusal to agree to the disclosure of a test result, or in the case of a contractor or consultant, refusal by their employer to disclose such test results
- Confirmed attempts to tamper with or alter a test sample

USE OF ACCREDITED COLLECTION SITES

Employers are required to retain the services of a third-party Accredited Collection Site to perform urine and/or oral fluid drug and alcohol testing. These collection sites must adhere to all necessary accreditation standards to guarantee the accuracy, reliability, and integrity of the testing process. The use of such accredited facilities ensures compliance with applicable regulatory requirements and upholds the integrity of the employer's drug and alcohol testing protocol.



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RESPONSIBILITIES

Supervisors and management representatives are responsible for monitoring job performance and individual behavior to identify potential issues related to the use of alcohol or drugs. To fulfill these duties effectively, training will be provided to supervisors. The following outlines their key responsibilities:

1. **Compliance with Policies:** Supervisors must be knowledgeable about and comply with the Company's Alcohol and Drug Policy and related procedures.
2. **Adherence to Safety and Work Standards:** Supervisors are required to ensure compliance with all work standards and perform their work-related activities safely and effectively, as part of their responsibility to maintain a safe work environment.
3. **Recognizing Substance Use Symptoms:** Supervisors must be informed about the effects of alcohol and drugs and be able to recognize the signs and symptoms of substance use among workers.
4. **Understanding Performance Management Policies:** Supervisors must understand the Company's performance management policy and recognize how the Canadian Model for Providing a Safe Workplace is integral to managing employee performance and workplace safety.
5. **Taking Action on Performance Deviations:** Supervisors are responsible for addressing any deviations in job performance that may be related to substance use.
6. **Addressing Suspected Substance Use:** Supervisors must take appropriate action when alcohol or drug use is reported or suspected among workers, in accordance with Company policies.
7. **Completion of Awareness Training:** Supervisors must complete awareness training on substance use and impairment, as outlined in the Employer Guidelines, to ensure they are equipped to handle these responsibilities effectively.

Workers have a critical role in maintaining a safe and compliant workplace. The following are their key responsibilities:

1. **Understanding Alcohol and Drug Policy:** Workers must be familiar with and understand the Company's Alcohol and Drug Policy.
2. **Ensuring Safety:** Workers are responsible for ensuring their own safety as well as the safety of others in the workplace.
3. **Compliance with Work Standards:** Workers must adhere to all work standards, performing their duties in a safe and responsible manner.
4. **Compliance with Alcohol and Drug Rules:** Workers must comply with the Company's Alcohol and Drug Policy and, if necessary, follow appropriate treatment programs as prescribed.
5. **Responsible Use of Medications:** Workers must use medications responsibly, be aware of potential side effects, and notify their supervisor of any side effects that could impair their ability to work safely.
6. **Encouraging Peer Support:** Workers are encouraged to support their peers and co-workers in seeking help before any potential breach or actual breach of the Company's policies occurs.

PREVENTION, INTERVENTION AND AFTERCARE

Management is committed to maintaining a safe and healthy work environment for all workers. The use of illicit drugs, alcohol, and the misuse of medications or other substances can have severe adverse effects, jeopardizing the safety and well-being of workers, the public, the environment, and the integrity of company facilities and equipment. Management will be informed of any instances where a worker is deemed unfit for duty or fails to comply with treatment recommendations. All health-related information will be handled confidentially, including collection, use, disclosure, storage, and retention, in compliance with applicable legislation.

Positive Test Results and Intervention



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In the event that an employee or contractor tests positive for drugs or alcohol, they will be immediately suspended without pay and required to meet with a Substance Abuse Professional (SAP). The SAP will assess the individual and determine whether treatment, counseling, and/or alcohol and substance abuse training are necessary.

- If rehabilitation is **not required**, the individual must attend a five (5) day awareness program provided by Provincial Health Services. The individual may only return to work upon successful completion of the program and passing a subsequent drug and alcohol test.
- If rehabilitation **is required**, the individual must complete a rehabilitation program as prescribed by the SAP. The individual may only return to work upon successful completion of the rehabilitation program and passing a follow-up drug and alcohol test.

In both scenarios, the employee or contractor will be subject to random drug and alcohol testing for a period of one year following their return to work. Continued employment during this period is contingent upon passing all required random tests.

Voluntary Requests for Assistance

Employees who believe they may need assistance with alcohol or drug issues are encouraged to voluntarily seek help from a Substance Abuse Expert (SAE) or through the Employee Assistance Plan (EAP). Employees who voluntarily request assistance will not face disciplinary action unless one of the following conditions applies:

- a) The employee has already violated the company's Alcohol and Drug Policy.
- b) The employee has been asked to confirm compliance with the Alcohol and Drug Policy.
- c) The employee has been asked to submit to an alcohol or drug test.
- d) The employee has been involved in a workplace incident.

Management's Response to Requests for Assistance

When an employee requests assistance, management is required to:

- a) Take the necessary steps to ensure the employee is fit for duty and does not pose a risk to themselves or others in the workplace.
- b) Inform the employee of the available support services through the Employee Assistance Plan (EAP).
- c) Encourage the employee to utilize the EAP. Should the employee fail to engage with the EAP, management may require the employee to undergo 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,
 - iii. An assessment by a Substance Abuse Expert (SAE), with confirmation provided to the employer that the employee has complied with these requirements.

Failure to comply with any of the above requirements (i, ii, or iii) may result in termination of employment.

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

Aftercare Compliance

An employee who receives assistance for alcohol or drug use through the EAP must adhere to the terms and conditions of any prescribed program as a condition of their continued employment. Failure to comply with the program's terms may result in further disciplinary action, including termination.

TESTING PROCEDURES AND LIMITS



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The Company's testing procedures, including both screening and confirmation tests, are aligned with the provisions set forth in the Construction Owners Association of Alberta (COAA) Alcohol and Drug Guidelines and Work Rule, except where specific location requirements necessitate modifications. Management will adhere to a strict and consistent process for initiating, conducting, and addressing all alcohol and drug-related testing.

All drug and alcohol testing records will be maintained in strict confidence, ensuring compliance with privacy and confidentiality standards.

COMMUNICATION

An employer is required to inform its employees of the existence of its Alcohol and Drug Policy and must take reasonable steps to ensure employees are aware of the following:

- a) The safety risks associated with the use of alcohol and drugs in the workplace,
- b) General education and awareness resources related to alcohol and drug use, and
- c) The assistance available to employees through an Employee Assistance Program (EAP).

By ensuring employees are aware of the safety risks associated with the use of alcohol and drugs, as well as the support services provided through the EAP, the employer increases the likelihood that employees will comply with the Alcohol and Drug Work Rule. Providing this information promotes a safer work environment and encourages employees to seek help when needed.



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APPENDIX A

COAA- Alcohol and Drug Guidelines and Work Rule

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	—
- Amphetamine	—	250
- Methamphetamine	—	250
- MDMA ¹	500	250
- MDA ²	—	250

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

1. Methylenedioxymethamphetamine
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	—
- Cocaine or Benzoyllecgonine	—	8
Opioids	40	—
- Codeine	—	40
- Morphine	—	40
- Hydrocodone	—	40
- Hydromorphone	—	40
- Oxycodone	—	40
- Oxymorphone	—	40
6-Acetylmorphine	—	4
Phencyclidine	10	10
Amphetamines	50	—
- Amphetamine	—	50
- Methamphetamine	—	50
- MDMA ¹	—	50
- MDA ²	—	50



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APPENDIX B

**ACKNOWLEDGMENT OF RECEIPT OF POLICY AND CONSENT TO SUBMIT TO DRUG AND
ALCOHOL TESTING AND TO RELEASE OF TEST RESULTS**

I, _____, hereby acknowledge that I have received a copy of the County of Northern Lights (the "Company") Alcohol and Drug Policy for Safety-Sensitive Positions and Selected Site Pre-Access Testing Requirements (collectively, the "Policy"). I confirm that I have read and fully understand the Policy, and I agree to comply with its terms.

I further consent to undergo drug and alcohol testing as outlined in the Policy, to the extent that the testing requirements apply to me, as a condition of my employment or continued employment with the Company.

I understand that the results of such tests will be disclosed to the Company and may be used as a basis for withdrawing any conditional offer of employment or taking adverse employment action, up to and including termination for cause. I also understand that the test results may be used to justify adverse employment action, including barring me from the Company's premises or worksites.

I acknowledge that I have the right to refuse to submit to such testing; however, I understand that refusal to submit to or cooperate with any part of the testing process will be considered a violation of the Policy and may result in the consequences outlined therein, including the automatic withdrawal of any contingent offer of employment.

I further agree that it is my responsibility to seek treatment for any drug or alcohol dependency and that I may disclose such dependency to the Company. Should I suffer from drug or alcohol addiction, I agree to participate in the Employee Assistance Program, applicable provincial alcohol and drug dependency services, or any other programs specified by the Policy. I understand that my participation in and successful completion of such programs will be monitored by the Company.

With full knowledge of the above, I hereby consent to undergo drug and/or alcohol testing by clinics and/or laboratories selected by the Company, and I consent to the limited release of my test results as described herein.

I have read and understood the above acknowledgment and consent. I certify that I have signed this document voluntarily and of my own free will, fully understanding its contents and implications.

ACKNOWLEDGEMENT & RECEIPT	
NOTE TO EMPLOYEE: This form will be made a part of your personal file. Please read and understand its contents before signing.	
Employee/Trainee (<i>Print</i>):	Date:
Signature:	

Chief Elected Official

Chief Administrative Officer