



GoM Regional Substance Abuse Policy

Purpose and Scope

BP is committed to providing a safe and healthy workplace that enables employees to perform at their most productive levels. Due to the safety sensitive nature of many of our positions, the GoM REGIONAL has implemented additional policy guidelines. This policy addendum is inclusive of all BP GoM REGIONAL employees (hereafter referred to as employees) unless noted otherwise. Policy guidelines that are specific to employees assigned to BP Outer Continental Shelf (OCS) assets and those occupying US Coast Guard (USCG) regulated positions are referred to accordingly. The GoM REGIONAL policy addendum enhances the overall effectiveness of the substance abuse program, follows USCG drug and alcohol testing requirements where applicable, and embodies the minimum standards of the BP US Substance Abuse Policy.

Non-BP employees performing work for BP on BP premises through a contractor or third-party employer are expected to meet requirements comparable to those of this policy. (The GoM REGIONAL Contractor Substance Abuse Policy is attached as a hyperlink - Section 10.)

Addendum to US Substance Abuse Policy

The following represent the GoM REGIONAL addendum to the US Substance Abuse Policy. It defines the policy requirements specific to the GoM REGION and their appropriate placement within the US Substance Abuse Policy.

4 Training

In accordance with BP US Substance Abuse Policy, computer-based education and training components are available on VTA for all GoM REGIONAL BP supervisors and employees. Both education and training components are mandatory and provide information concerning employee obligations under the US Substance Abuse Policy. A supervisor’s completion of the training will be documented in VTA.

7 Prohibited substance testing

In addition to the categories of testing covered in the US Substance Abuse Policy, GoM REGION shall perform non-DOT testing for an expanded opiate panel, as listed in the embedded Extended Opiate Confirmation chart, for all employees subject to random testing at the heliport.

Extended Opiate Confirmation		
Drug Code	Screening Level	Confirmation Level
CODEX		150
HYCODEX		150
HYMOREX		150
MOREX		150
OPIEX		150
OXCODEX		150

(d) Post-accident/incident testing

In accordance with US Substance Abuse Policy, all alcohol testing will occur within 2 hours, and a maximum of 8 hours, of a non-minor work-related accident/incident which occurs at a BP OCS facility, and within 32 hours for other substances. Post-accident/incident drug and alcohol testing applies to all persons (not limited to crew members) on board the facilities that are determined to be directly involved in a non-minor work-related accident/incident (NMWRA). As soon as it is determined that an incident is or will qualify as non-minor, facility management must take all practical actions to have each individual who may have contributed to the incident chemically tested for dangerous drugs and alcohol. An individual who

is “directly involved” is defined as someone whose order, action, or failure to act is determined to have, or cannot be ruled out as having, caused or contributed to the incident. (The GoM REGION Post-Accident/Incident Drug and Alcohol Testing Policy is attached as a hyperlink – Section 10.)

(e) Random testing

All employees transiting the heliport, regardless of role, are included in the selection pool for random substance testing.

(i) Testing mandated by law

Employees assigned to BP’s OCS facilities may fall within the scope or authority of prohibited substance testing regulations issued by the USCG. The GoM REGION will test all OCS facility crewmembers on a random basis at an annual rate no less than 50 percent who occupy the following Licensed Mariner and designated safety sensitive positions.

USCG Licensed Mariner Positions

- Offshore Installation Manager
- Ballast Control Officer
- Barge Supervisor (and alternate)

Unlicensed Positions

- Lifeboatman
- Production Control Room Operator
- Firefighting Specialist (and alternate)
- Able Bodied Seaman (and alternate)
- Ordinary Seaman

(k) Missed test

An unexplained missed random or otherwise required alcohol and/or drug test will be deemed a positive test result and subject to disciplinary action to include termination.

8 Results

(b) Alcohol test results

Except as defined otherwise through required USCG, DOT or other government random testing programs, alcohol test results will be treated as follows:

- Less than a 0.02% Breath Alcohol Concentration (BAC) – a negative test result, fit for duty.
- **First** event equal to or greater than 0.02% and less than 0.04% BAC:
 - ✓ Remove from active duty and suspension; and
 - ✓ Denial of access to any BP facility and mandatory referral to Substance Abuse Professional (SAP).
 - ✓ Employee may not return to work until SAP is contacted and a negative test result is obtained
- **Second** event equal to or greater than 0.02% and less than 0.04% BAC:
 - ✓ Remove from active duty; and
 - ✓ Deemed a positive test result and subject to disciplinary action to include termination.

- **First event equal to or greater than .04% BAC:**
 - ✓ Remove from active duty; and
 - ✓ Deemed a positive test result and subject to disciplinary action to include termination.

(c) Adulterated test results

Submission of a specimen by an employee that the Medical Review Officer (MRO) verifies as adulterated or substituted will be considered a positive specimen and result in employee termination.

9 Disciplinary Implications

The US Substance Abuse Policy allows for an opportunity for rehabilitation following a first positive test. It also allows for termination following a first positive test. Given the safety sensitive nature of many of our jobs, particularly offshore, we will more vigorously scrutinize such a decision. Violations of this policy by employees will result in their immediate removal from the work place. Further, violations of this policy by employees traveling to GoM REGION offshore assets will result in their immediate access denial to those assets.

All violations will be reviewed by appropriate GoM REGION management, GoM Medical and HR as they pertain to Employee Assistance Program referral, disciplinary action and access reinstatement.

Employee Help

It is important for everyone to know that if you are currently struggling with substance abuse or addiction, you may confidentially refer yourself to our Employee Assistance Program for assessment. We encourage anyone who has a concern to take advantage of this opportunity now, and not risk the consequences of testing positive in a company substance test or otherwise being found in violation of our policy. You can have a confidential conversation with APS, our EAP provider, by calling 1-800-409- 3687. APS also offers free, confidential counseling about a variety of issues, including marriage counseling, teen issues, eldercare options, saving for college, child care options – almost any issue that affects you outside of work. If you would like to review the complete US Substance Abuse Policy, you can access it at www.lifebenefits.bp.com. Thank you for your commitment to a safe workplace for everyone.

Statement of Confidentiality

It is the policy of BP that medical information, whether in verbal, written or electronic form, is considered privileged and strictly confidential. All such confidential information will be maintained in a confidential file separate from any other employee information, which ensures its privacy and safety. This information will only be disclosed to those with a legitimate “need to know.” Employees who disclose confidential medial information without proper authorization will be subject to disciplinary action up to and including dismissal from BP.

Sample situations

The following examples are provided for clarification purposes.

If...	Then...
If a cold sample is provided by donor.	For a BP employee, an observed second test is performed and both samples are sent to the lab for diagnosis, employee is removed from active duty, lab/MRO results are provided to BP DER who shares with HR and responsible management for review. For a contract employee, the same steps apply, however, the donor is immediately placed on the Prohibited Access List for a Security violation and all lab/MRO results are provided to contract company’s DER.

If insufficient sample.	Refer to US Substance Abuse Policy for direction.
If individual BAC is 0.02 or above on first BAT, but less than 0.02% BAC upon confirmation.	Considered a negative test result, fit for duty.

10 Addendum

[Post Accident Drug and Alcohol Testing Policy](#)

[GoM REGIONAL Contractor Substance Abuse Policy](#)

Revision Log

Revision Date	Authority	Custodian	Revision Details
03/30/2009			Issued for use
06/01/2009	VP GoM HSSE & Eng	GoM HSSE	Re-issued for use
08/02/2010	VP GoM HSSE & Eng	BP HSSE Security Manager	<ul style="list-style-type: none"> Added non-BP employee statement – Purpose and Scope Noted change of Post Accident Drug and Alcohol Testing Guideline to Policy Removed definition of non-minor work related accident/incident Added link to GoM REGIONAL Contractor Substance Abuse Policy (10 Addendum)
9/21/2012	VP S&OR	GoM Director of Security	<ul style="list-style-type: none"> Updated SPU to Region Updated VP HSSE & Engineering to VP S&OR Updated Security Manager to Director of Security
9/27/2013	GoM Security Director	Joe Wein	<ul style="list-style-type: none"> Updated Authority and custodian
11/25/2014	HSE Manager	Health Manager	Document reviewed with no changes.
10/28/2015	Health Manager	Occupational Health Advisor	Document reviewed with no changes.

Gulf of Mexico



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Special Instructions	Document reviewed with no changes		
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This form to be used for authorizing new, revised and obsolete documents, please indicate clearly which category applies:			
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	Print Name & Title	Signature	Date
Custodian	Name here: Laura East Title: Occupational Health Advisor	<i>Laura E. East</i>	10/28/2015
Authority	Name Here: Valerie Murray Title: Health Manager	<i>Valerie Murray</i>	10/28/2015

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