

Gulf of Mexico



Operations: HSE

Health and Industrial Hygiene

Medication Policy (Offshore)

AMENDMENT RECORD

| Amendment Date | Revision Number | Amender Initials | Amendment |
|----------------|-----------------|--|---|
| 03/03/2016 | 5 | MClark LEast PGlencross DHaines MMark VMurray | Revised Introduction (Sec 1). Key Responsibilities (Sec 3): added Workforce; HS Lead; Medic and Security. General Requirements (Sec 4) added to cover Prohibited, Dangerous, Restricted, and Cautionary drugs, chemicals, and medication. Process (Sec 5) was added to describe, Prohibited Dangerous and Restricted assessment process and disciplinary action for medication policy violations. Deleted Appendices: Medication Side Effect Tool and Possible Side Effects and Interactions of Herbal Supplements with Prescription Medications. Revised Appendices Frequently Asked Questions (FAQ), FAQ Adderall and Vyvanse - Drug Testing and Medical Clearance, and Offshore Medic Information Form. Added Appendices: Dangerous, Restricted, and Cautionary Medication, Drugs, Chemicals, Herbals, and Dietary Supplements, Offshore Medication Clearance, Notice for Physicians Regarding Offshore Work, and Medication Violation Interim Safety Plan. Revised Appendices |
| 1/7/2015 | 4 | VMurray | Document reviewed with no changes. |
| 01/02/2013 | 3 | Director of Health and Safety Health & Industrial Hygiene Team Leader | Section 1.0: Added herbal and dietary supplements. Section 2.0 Added the definition of medical marijuana. Section 3.1: Added Other-Medical Marijuana. Section 3.4: Added the word "prescription". Section 3.2: Added a paragraph on medical marijuana. Section 4.2: Added Director of Security and Industry. Appendix 1: Added medical marijuana to prohibited list in bold. |
| 10/15/2012 | 2 | Director of Health and Safety Health & Industrial Hygiene Team Leader | Section 2.0 Added definitions for herbal and dietary supplements. Section 3.0 added: Information regarding how to correctly bring prescription and/or OTC medications or supplements offshore. 3.1 Removed duplicate table of prohibited medications. Added "Vyvanse" to Appendix 1. Section 4.3 Added role of OHP. Appendix 4: Added language regarding contractors' case management. Appendix 5 added: Personal Medication Inventory and Personal Medication Dispensed Inventory |
| 07/26/2012 | 1 | Director of Health and Safety Health & Industrial Hygiene Team Leader | Title changed from Guideline to Policy. Changed location to Medic in Section 3.0. Prohibited changed to Medications Required To Be Evaluated, added Smoking Cessation and Weight Management Medications, highlighted prohibited Medications, added in Section 3.1. Added Medic responsibilities in section 4.4. Changed BP Supervisor to BP Team Leader. In Sec. 4.5 changed Appropriate Area Management Representative to Medic. Also in Sec. 4.5 changed from GoM Health Team to GoM Occupational Health Nurse and Medic. 5.0 Disciplinary implications added. 7.0 added Prescription Med reference. Added Medication Side Effect Tool in Appendix 1. Added Appendix 2 Herbal Supplements, Added appendix 3 Frequently Ask |

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| | | | Questions Added Revision Log at end of document. |
| 06/01/2008 | 0 | BP HSSE & Engineering GoM Health & Safety Manager | Initial Issue |

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1 Introduction

Prohibited drugs, medications and chemicals are not permitted on company facilities. Use of legal medication that may be compatible with onshore employment may pose a hazard while offshore to individuals, co-workers, rescue personnel, facility, and the natural environment. Offshore work involves long and sequential workdays (often 12 hour shifts, two weeks continuously), exposure to the marine environment, the capability to muster at any hour for evacuation, mental and physical fitness needed to save one's self (submerged helicopter ditch, facility evacuation, self-survival tasks). Critical tasks affecting others also include emergency duties as part of, or in addition to, one's usual job. There is limited medical care offshore for those with established medical disorders. There are delays in definitive care onshore for acute or uncontrolled medical conditions or medication toxicity. There can be prolonged waits (weather conditions, technical problems) for emergent medical evacuation and poor conditions pose a risk to rescue flight crews.

The requirements of this Medication Policy are job-related and consistent with business necessity in that they are intended to describe the permitted and safe use of prescription and nonprescription medication, drugs, chemicals, herbals, and dietary supplements in a remote offshore environment to ensure that workers do not present a direct threat to themselves or others. The Policy describes Prohibited, Dangerous, Restricted, Cautionary drugs, chemicals and medications and the requirements associated with each.

2 Scope

This Policy applies to individuals in the GoM workforce (GOO, GPO, GWO) and others travelling to offshore facilities who have been prescribed or use prescription and/or over-the-counter (OTC) medication, drugs, chemicals, herbals, or dietary supplements while working offshore. This Policy is in conformance with OMS 3.4 Health and Industrial Hygiene.

3 Key Responsibilities

3.1 Workforce

- A. Medication supply, labelling, and containers shall be as described in 4.1.
- B. Must not possess Prohibited drugs or chemicals as described in 4.3.1.
- C. Must report Dangerous or Restricted medication, drugs, chemicals, herbals, and dietary supplements to the Medic AND, must report any drug reactions or health issues that may adversely impact their ability to safely perform their job to the Medic in the following instances:
 - 1. Initial arrival offshore and/or subsequent medication changes.
 - 2. When there has been an adverse drug reaction while taking his/her current medication that may adversely impact their ability to safely perform their job or emergency duties.
 - 3. When there has been a change in overall health due to a current or recent illness or injury that may adversely impact their ability to safely perform their job or emergency duties.
- D. Must report when there is reason to believe that another individual is impaired and unable to perform their duties safely.

- E. Document medications using the Offshore Medical Information Form (Appendix 9) and provide to the Medic.

3.2 Health Manager

Assess at defined intervals the results of self-verifications, key performance indicators (ex. violations, restrictions, medication safety plans, offshore medic audits, for cause drug tests, random drug tests, heliport searches, fitness for duty reports, medication-related workplace injuries) to ensure effectiveness of policy, identify trends, emerging risks and opportunities to improve risk reduction measures for preventing impaired workers who may pose a direct threat to themselves or others from performing safety-sensitive work.

3.3 Occupational (Medicine) Physician (OP)

- A. Assist in the development and review of this Policy.
- B. Assist the Medic and Occupational Health Nurse with completing medical reviews of individual drugs, chemicals, and medications.

3.4 Occupational Health Nurse (OHN)

- A. Provide technical support to BP Offshore Leadership, Medics, individuals, and contractors regarding this Policy.
- B. Consult with the OP on medication issues, where appropriate.
- C. The Offshore Medication Clearance Form (Appendix 6) shall be sent to the prescribing physician. The Notice for Physician Regarding Offshore Work (Appendix 7) and a current job description will accompany. Upon receipt of the completed clearance form, it will be reviewed with the Medic.
- D. Provide case management support to individuals, this will include considerations of the patients' condition and potential effects of the medication.
- E. Arrange fitness for duty evaluations as needed.

3.5 Health and Safety Site Lead (HS Site Lead)

- A. Assist with providing information to Medic regarding job duties of workers seeking approval for use of Dangerous or Restricted medications offshore.
- B. Collaborate with BP Offshore Leadership, Medic, OHN, OP, and personal physician to determine safety plan and interim job restrictions for medication issues or concerns in need of individualized assessment.

3.6 BP Offshore Leadership (Offshore Installation Manager (OIM), Team Leaders)

Consult with the OHN when there are questions or assistance is needed on this Policy or when an individual is observed to exhibit possible performance impairment and may be unable to safely perform their job.

3.7 Medic and Medical Control (supervising physician of the Medic)

- A. Review Offshore Medical Information Form completed by individuals arriving offshore.
- B. Provide confidential consultation to personnel arriving on the facility and give guidance on Prohibited, Dangerous, Restricted, and Cautionary medication, drugs, chemicals, herbals, and dietary supplements as shown in Dangerous, Restricted, and Cautionary Medication, Drugs, Chemicals, Herbals, and Dietary Supplements (Appendix 1).
- C. Consult with OHN when necessary for Prohibited, Dangerous and Restricted categories or medication in unknown category.
- D. For Dangerous and Restricted categories, the Offshore Medication Clearance Form (Appendix 6) shall be completed and sent to the prescribing physician. The Notice for Physician Regarding Offshore Work (Appendix 7) and a current job description will accompany. Upon receipt of the completed clearance form, it will be reviewed by the Medic. The Medic will forward to the OHN for review.
- E. Initiate a Medication Interim Safety Plan (Appendix 8) for individuals that are discovered to have Dangerous or Restricted drugs, chemicals, or medications. A physician (Topside Medical Control physician, OP, or primary treating physician) will be consulted for medical restrictions. This plan will then be reviewed by HS Site Lead, OIM and/or Team Leaders, OHN, OP, and/or contract company representative, as appropriate.
- F. Identify any current symptoms from medication or medical conditions which may require additional monitoring, treatment, or work restriction and report these to Topside Medical Control physician for medical orders.

3.8 Security

- A. Security will consult with OHN when a Prohibited or Dangerous drugs, chemicals or medications are found on routine baggage screening at heliport, or if discovered during other safety mandated searches.
- B. Security ensures that this and other policies applicable to possession of Prohibited drugs, chemicals and medications are enforced at the heliport (Section 7).

4 General Requirements

- A. Medications, drugs, chemicals, herbals and dietary supplements shall not:
 1. Diminish ability to safely perform assigned normal duties, or assigned safety sensitive duties to the extent that an individual poses a direct threat to him/herself or others.
 2. Impair mental or physical function during 24 hour/7 day a week periods where emergency actions, escape, and survival may be required.
 3. Cause adverse reactions or side effects which would create an undue risk of harm in situations of moderately heavy work, frequent lifting or climbing stairs, heat, close quarters living, dangerous machinery, equipment and fall hazards, shiftwork or contribute to significant excess fatigue from work hours and schedule
 4. Require medical monitoring, antidotes for narrow therapeutic dosing, have serious drug interactions, have dangerous consequences of a forgotten medication, or other serious complications that could be reasonably anticipated and where treatment cannot be effectively delivered offshore or within acceptable and predictable time frames.

5. Be withheld or neglected when medically needed in an attempt to be compliant with this Policy.
- B. Besides the medications themselves, an underlying medical condition may pose added risk for an offshore job. Medics who become aware of medical conditions that could potentially impair a worker's ability to safely perform their job duties may seek out qualified professional opinion (Topside Medical Control, prescribing physician, OHN) for individualized assessments as to whether the individual presents a direct threat to themselves or others considering the nature of the offshore work and environment.

4.1 Medication Supply, Labeling, and Containers

- A. Individuals shall be responsible for bringing the correct type and amount of unexpired medication with them when working offshore.
- B. Individuals shall not bring more than an extra week's prescription medication for an offshore rotation.
- C. All over-the-counter or prescribed medication must be in the original, labeled containers as required by federal law. If the labels are not in English, there must be an explanatory medical document in English. All herbals or dietary supplements shall also be in the original, labeled container.
- D. Substitute containers are not acceptable for transport (including daily or weekly dispensing containers).

4.2 Medication Reporting Requirements

- A. All individuals taking medication, drugs, and chemicals identified as Prohibited, Dangerous or Restricted as outlined in Appendix 1 must report these to the Medic. All other medication and many medical disorders may be important for the delivery of appropriate emergency medical care, and individuals are strongly encouraged to report these to the Medic on arrival as well.
- B. The individual shall complete the Offshore Medical Information Form (Appendix 9) and deliver this to the Medic.
- C. The Medic shall compare the individual's list to the Prohibited list (no use), Dangerous list (highly restricted requires BP approval), Restricted list (also requires medical approval) in Appendix 1 and take the appropriate steps as required per policy. In addition to the responsibility for verifying conformance with the medication policy, the Medic is the offshore medical professional responsible for responding in the case of an emergency and knowledge of what medication an individual is taking may be critical to providing appropriate emergency care.

4.3 Prohibited, Dangerous, Restricted, and Cautionary Categories and Examples

- A. Prohibited illicit, illegal, improperly used, and marijuana drugs and chemicals and medication are described in Section 4.3.1 and strictly prohibited offshore.
- B. Dangerous, Restricted, and Cautionary Medications, Drugs, Chemicals, Herbals, and Dietary Supplements (Appendix 1) lists Dangerous, Restricted, and Cautionary categories and examples. **This is not an exhaustive list.**
- C. Dangerous and Restricted medication may be used if there is prior medical clearance provided to the Medic (Section 5.1).

- D. A confidential discussion/evaluation with the individual shall be held with the Medic and/or OHN if there is any question about medication category and use offshore.
- E. If further clarification of this Policy is needed, contact the BP GoM Occupational Health Nurses. For frequently asked questions about this Policy, refer to Appendix 2.

4.3.1 Prohibited Drugs, Chemicals, and Medications

Use, possession, distribution, transport, purchase, supply, attempt to sell, or sale of illicit drugs; illegal prescription medication; improperly used medication; and medical marijuana are all prohibited on company facilities.

4.3.1.1 Illicit Drugs and Chemicals

Illicit drugs and chemicals are either illegal, or controlled drugs which are illegal to prescribe by physicians under United States (U.S) federal Law, or have no currently accepted medical use in the U.S., or lack accepted safety for use under medical supervision, and often have a high potential for abuse according to U.S. federal law, local law, or substance abuse professionals. These include marijuana, synthetic marijuana (Spice or K2), cocaine, methamphetamine (Meth), heroin, lysergic acid diethylamide (LSD), mescaline (peyote), methylenedioxymethamphetamine (MDMA, ecstasy or Molly), gamma-hydroxybutyric acid (GHB), psilocybin, methaqualone (Quaalude), cathinone (Khat), methylenedioxypropylone (MDPV or Bath Salts), rohypnol (Roofies), intoxicative inhalants or solvents (Poppers, paint or glue sniffing, Whippits).

4.3.1.2 Illegal Prescription Medication

Illegal prescription medication is medication obtained without a prescription or a federally controlled substance transported or shipped to an individual from foreign countries. These include narcotics or controlled substances which are not purchased from a pharmacy, and narcotics or controlled substances shipped from overseas. Examples include illegal purchase and use of depressants and tranquilizers (Downers, Benzos, Barbs, Reds, Tranks), codeine (Cody), opiates (Oxy, Percs, Demmies), stimulants (Uppers, Speed, Bennies), or ketamine (K, Jet). Examples of medication commonly shipped illegally from overseas include anabolic steroid for injection (Roids, Juice).

4.3.1.3 Improperly Used Medication

Improperly used medication includes prescription medication that is not prescribed or labelled for use by the specific individual, or prescription medication that may have been prescribed previously but is not recommended by a physician currently, or any other medication (including over the counter medication) that is used or abused for reasons other than its intended medical purpose. Examples of improperly used prescription medications include use of a family member's prescriptions, use of an old narcotic medication for a new condition for which it was not prescribed, use of a prescribed stimulant or narcotic medication for recreational purpose, or preparing a prescribed oral medication for injection into the veins. Examples of improperly used over the counter medication include dextromethorphan (DXM, Robo) and Coricidin (CCC).

4.3.1.4 Medical Marijuana

There are several states that allow the use of medical marijuana. None of these states allow an individual to circumvent an employer's policy, nor does the state law require an employer to accommodate or allow an employee's use of marijuana in the workplace. A positive test, even if the individual possesses a prescription, will be deemed a positive test and may be grounds for withdrawal of an offer of employment, and for disciplinary action up to and including termination of employment or, if a contractor, restricted from work on BP facilities.

4.3.2 Dangerous Drugs, Chemicals, and Medications

Dangerous drugs, chemicals and medication include prescribed medication that may pose the highest level of danger to health and safety in the offshore environment. Examples of some Dangerous medications include:

- A. Tranquilizers and medication with sedation are dangerous because their intended effects pose significant risks by inhibiting individuals' ability to self-evacuate offshore.
- B. Narcotic pain medication (opiate) poses dangers associated with dependence, sedating effects, fluctuant therapeutic and functional levels. The intended medication effect of reduced pain and the resulting euphoria are closely tied to slowed physical activity, response, mood changes, and mental confusion. Once taking the medication, side effects from missing doses can include rebound pain (worsened), anxiety and agitation. The rapid tolerance to the beneficial effects of lower doses leads to the need for larger doses. Larger doses can lead to even greater sedation, unintended effects, or even impaired breathing. Safety risks are elevated. For instance, drivers have greater risk of being involved in a motor vehicle accident while taking opiates. Achieving the appropriate dose and balance with the medication is often challenging, particularly early in treatment or with intermittent dosing. Prescribed painkillers account for the majority of narcotic overdoses requiring hospitalization.
- C. Medication with intentional or secondary depressant effects on the nervous system and reaction time, coordination, or alertness such as anti-psychotic, tranquilizer, anxiolytic, sedating muscle relaxant medications are dangerous offshore. Lapses of attention during critical monitoring tasks, or when working with machinery or equipment, overlooking safety hazards, and becoming difficult to arouse in a facility emergency can threaten lives and health. For instance, benzodiazepines (depressants) are associated with increased risk for traffic accidents and fatalities.
- D. Anticoagulation medication that may lead to life threatening bleeding offshore based on limited offshore medical care, which can pose life threatening danger.
- E. Certain antidepressants with more common and more severe side effect profiles such as tricyclic antidepressants and monoamine oxidase inhibitors (MAOI) are dangerous for offshore work related to their side effects of dropping blood pressure, dizziness, lightheadedness, blurred vision, drowsiness and heat intolerance.
- F. Strong immunosuppressant medication or chemotherapy with frequent adverse reactions or heightened risk for a rapidly deteriorating septic infection is dangerous based on limited offshore medical care.
- G. Medication intended to self-treat reduced cardiac blood flow such as nitroglycerin is considered dangerous due to the likelihood of requiring advanced medical care immediately following use.

4.3.3 Restricted Drugs, Chemicals, and Medications

Restricted drugs, chemicals and medications include prescription and non-prescription medications or herbals that may pose a danger to the individual performing offshore work. Medications in this category may pose added risk offshore if a period of safe use has not been observed while onshore. Examples of some Restricted drugs, chemicals and medications in this category include:

- Medication with a narrow therapeutic window and higher risk for sudden incapacitation, severe disability or death. For insulin: the individual must have hypoglycemic awareness and have no collapse due to hypoglycemia requiring the assistance of others in 12 months.
- Medication with abuse potential. For stimulants: Adderall or Vyvanse, commonly prescribed medications for the treatment of Attention Deficit Hyperactivity Disorder (ADHD), are restricted medication for use offshore. Adderall or Vyvanse can result in a positive urine drug test. Refer to Frequently Asked Questions on Adderall or Vyvanse - Drug Testing and Medical Clearance (Appendix 3).
- Use of long term seizure medication, chronic neurological medication, cardiac medication for arrhythmias, antiplatelet, antidepressants, acute severe allergy medication, and bronchodilators for acute respiratory attacks, should be individually assessed. These medications should be evaluated in relation to risk for injury in the individual's workplace (seizure, tremors, bleeding), risk for sudden incapacitation (acute asthma, irregular heart rhythms), stable mood in relation to mental performance (antidepressants), and risk for sedation during work (allergy medication).

Drugs, chemicals and medications in this category require an individualized assessment prior to use offshore as described in 5.1 below.

4.3.4 Cautionary Drugs, Chemicals, and Medications

- A. Cautionary drugs, chemicals, and medications include other medication, herbals, or dietary supplements for which there are no or rare reports of, and limited potential for, serious adverse consequences while used in offshore or remote environments.
- B. Cautionary drugs, chemicals, and medications may have some increased risk related to offshore use, but this is not deemed sufficient to require further medical review. All medication can have adverse reactions and theoretically created unsafe situations, but this category, if used properly, under medical supervision, and with early self-reporting of adverse reactions, should be safe in the offshore environment for the majority of individuals. There may be an increased risk of a medical evacuation related to the need or use of this medication, but that risk alone is deemed insufficient to prohibit its use offshore.
- C. Cautionary drugs, chemicals, and medications may also include other medication that may be started shortly before arrival or initiated offshore where there is no established prior safety concern in a specific individual. Individuals are expected to have a general understanding of the effects, side effects, and potential adverse consequences. Conditions of safe use may be set by the prescribing physician or recommended by the Medic.
- D. If used improperly, see 4.3.1.3 above.

4.3.4.1 Internet Prescription Drugs

Many prescription medications are available through the internet. Some internet prescription drugs may be ordered by consulting physicians that work in conjunction with the internet pharmacy and neither fully examines the patient, nor communicates with a patient's personal physician. An internet physician may also not comply with local and state telemedicine regulations. Internet prescribed drugs which are not listed here as Prohibited, Dangerous or Restricted are considered cautionary for offshore use. BP GoM Occupational Health is not responsible for researching the legality of internet prescriptions but may determine that standards of medical practice have been overlooked and may request a knowledgeable medical opinion. It is recommended that individuals discuss their medications with their personal physician. Controlled substances mailed from foreign countries are illegal and Prohibited, see 4.3.1.2 above.

5 Process

5.1 Medical Clearance for Dangerous and Restricted Drugs, Chemicals, and Medications.

Medical approval prior to use of Dangerous or Restricted drugs, chemicals, and medications offshore shall include the following elements:

- A. Prescription from a prescribing physician who is both aware the worker is offshore and who has an expert understanding of the medication's safety profile in the particular individual. The expert understanding shall include all of the below:
 - 1. Effects on mental clarity, concentration, memory, alertness, physical reflex and responsiveness, balance, heat stress, and physical strength.
 - 2. Interactions or altered blood level when used with other prescribed or over the counter medication likely to be needed or used concurrently
 - 3. Altered effects related to sleep variations, shiftwork, physical exertion, and diet.
 - 4. Prescribed individual's compliance and demonstrated responsibility for the appropriate use and recognition of side effects of the medication.
 - 5. Prior monitoring onshore (before travel offshore) demonstrating effectiveness and safety, with either intermittent dosing or when achieving steady state levels.
- B. Agreement of an OP or OHN who is knowledgeable about the offshore environment including diet, physical function, social, mental, sleep, shift, safe work performance, and other demands of work and life in a remote environment.
- C. Agreement of the Medic and Medical Control familiar with the availability of life saving resources, emergency medical personnel, treatment, antidotes, overdose, emergency evacuation protocols, weather and technical challenges for evacuation in a remote work environment.
- D. Notification of Offshore Installation Manager (OIM) and operational leadership in circumstances where substantial risk remains, particularly in relationship to safety sensitive or higher risk job duties that impact the safety of coworkers, the facility, or the natural environment.

The Offshore Medication Clearance Form (Appendix 6) shall be sent to the prescribing physician. The Notice for Physician Regarding Offshore Work (Appendix 7) and a current

job description will accompany. Upon receipt of the completed clearance form, it will be reviewed by the Medic. The Medic will forward to the OHN for review.

5.2 Medication Policy Violation

- A. Upon identification of a Policy violation, the Medic will contact the OHN for an immediate individualized assessment for the individual.
 - 1. Based on the initial evaluation, duty may be severely restricted. For example, restrictions may include no hazardous or safety sensitive duties, no exposure to heat stress, no climbing ladders, no work at heights, no work near dangerous machinery, no sustained attention for safety, no use of a painful extremity or lifting with back, no isolated duties, and return to shore may be indicated.
 - 2. The OHN will provide guidance on meeting the policy requirements to the line manager or contract company representative.
 - 3. Contact with the personal physician may be required to formulate a Medication Interim Safety Plan (Appendix 8) if the individual is already offshore with a Prohibited, Dangerous or Restricted medication.
 - 4. On medical review, risk may not be imminent or serious and the individual may be approved to continue duties with conditions, such as medical monitoring by the medic. The individual may also receive instructions on obtaining further medical evaluation before returning to offshore work.
- B. Immediate drug and alcohol testing may be required if there is suspicion or report of illicit or illegal substance use.
- C. Illicit drugs, illegal medication, Prohibited and improper medication will be confiscated by the Medic.
 - 1. Until a final determination is made regarding health and safety, or the individual is transferred to shore, Prohibited, Dangerous or Restricted medication that is medically necessary will be closely monitored, which may include dispensing daily from sickbay.
 - 2. Daily or more frequent medical checks may be required.
- D. BP OHN cannot offer alternative medication recommendations in cases of Medication Policy Violations.
- E. BP reserves the right to restrict access to offshore facilities if a consensus approval of prescribing physician, BP Occupational Health, and BP Offshore Leadership is not achieved.
- F. The Medication Interim Safety Plan (Appendix 8) shall be used to meet the requirements of this section.
- G. If Prohibited or Dangerous drugs, chemicals, or medications, or unlabeled medication are discovered at the heliport, Security is notified and contacts the OHN. Drug testing may also be required prior to departure to offshore facility.

5.3 Storage of Personal Medications by Medic

If the Medic determines that any Prohibited substance or personal medications shall be stored in sick bay, Sickbay Storage of Personal Medication and Personal Medication Dispensed from Sickbay Forms (Appendices 4 and 5) shall be used to document the confiscation, transfer, and storage process.

5.4 Return to Work

- A. Medical review is required prior to return to work offshore for violations of Prohibited, Dangerous or Restricted drug, chemical, or medication use.
1. Prohibited drugs, chemicals and medication will not be permitted back to an offshore facility.
 2. Dangerous or Restricted drugs, chemicals, and medications will be addressed as previously described in 5.1. Prior to return to duty following discovery of a Prohibited drug, chemical or medication, BP GoM Occupational Health or contractor's employer shall obtain a medical opinion that will explicitly state that the medication is not medically required.
- B. Following a medication policy violation, the individual may also be required to:
1. Undergo a medical evaluation of fitness for duty,
 2. Pass a functional agility test.
 3. Demonstrate completion of a substance abuse rehabilitation program, and return-to-duty drug screen.

5.5 Disciplinary Action

- A. If this medication policy is violated, a BP employee may be disciplined up to and including termination. Contractors will be subject to their own company disciplinary policy.
- B. Violations of this policy by individuals traveling to GoM Region offshore facilities may result in their immediate denial of access to BP offshore facilities.
- C. Violations will be reviewed by appropriate GoM Region Management, GoM Health Team, and Human Resources staff as they pertain to disciplinary action and access reinstatement.

6 Definition and Acronyms

| Terms | Description |
|------------------------------------|--|
| Cautionary | use with individual caution |
| Dangerous | Highly restricted, requires onshore medical and facility medic to review prior to use offshore |
| Dietary Supplements | also known as food or nutritional supplements, also including vitamins, minerals, fatty acids, fiber, or amino acids |
| Individuals | persons for whom the medication policy applies including employees, contractors and visitors to offshore facilities |
| Herbals | a product made from a plant that is thought to be useful in treating |
| Over-the-Counter Medication | non-prescription medication that an individual can generally use safely without a prescription to treat minor illnesses and symptoms |
| Medical Marijuana | Marijuana that has been prescribed by a physician in a state that has enacted laws to legalize its use for medical purposes. |

| | |
|--------------------------------|--|
| Prescription Medication | medication that must be prescribed for a particular individual by a licensed health care provider and must be dispensed by a licensed pharmacist |
| Prohibited | not permitted for use offshore |
| Restricted | requires onshore medical and facility medic to review prior to use offshore |

7 Key Documents/References

BP Drug and Alcohol Misuse Policy (U.S.)

GoM Injury and Illness Case Management Safe Work Practice (SWP)

GoM Offshore Access Policy

GoM Region Contractor Substance Abuse Policy

GoM Region Post-Accident/Incident Drug and Alcohol Testing Policy

GoM Regional Substance Abuse Policy

GoM Fitness for Duty Policy (Offshore)

8 Appendices

APPENDIX 1

Dangerous, Restricted, and Cautionary Medications, Drugs, Chemicals, Herbs, and Dietary Supplements

BP GoM Medication Policy (Offshore)

Appendix 1. Dangerous, Restricted, and Cautionary Medications, Drugs, Chemicals, Herbs, and Dietary Supplements.*

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|-------------------|--|--|--|--|--|
| DANGEROUS | <p>DEA schedule I: Marijuana(prohibited)</p> <p>DEA schedule II: Methadone, Dilaudid, Demerol, Fentanyl, Oxycontin, Morphine, Hydrocodone, Suboxone, Opana Codeine (high dose)</p> <p>Barbiturate: Fioricet, Fiorinal</p> <p>Muscle Relaxer: Soma, Baclofen, Flexeril, Robaxin, Valium</p> | <p>Tranquilizer, Hypnotic: Ambien, Halcion, Lunesta, Klonopin Trazadone, Restoril</p> <p>Anti-anxiety / Benzodiazepine Ativan, Librium, Valium, Klonopin, Xanax (1mg), Serax, Restoril, Halcion, Buspar</p> <p>Weight Loss Adipex</p> <p>Lithium</p> | <p>Tricyclic Antidepressant: MAOI Anafranil, Elavil, Ascendin, Sinequan, Norpramin, Tofranil, Pamelor, Vivactil, Surmontil, Selegine, Parnate, Nardil,</p> <p>Antipsychotics Mellaril, Loxitane, Mobar, Navane, Prolixin, Serentil, Stelazine, Thorazine, Trilafon, Abilify, Clozaril, Geodon, Risperdal, Seroquel, Zyprexa,</p> | <p>Potent Immune suppressant: Prednisone 20mg/d, Prednisolone 20mg/d, Dexamethasone 3mg/d, Gengraf, Copaxone, Methotrexate Imuran, Cytoxan, Chlorambucil</p> <p>Anticoagulant: Warfarin, Lovenox Xarelto, Pradaxa, Eliquis</p> <p>Nitroglycerin</p> <p>Antiparkinson</p> | <p>DANGEROUS Dangerous to health and/or safety offshore. Requires medical clearance from BP Occupational Health before bringing offshore (Medical Marijuana is prohibited).</p> |
| RESTRICTED | <p>Tramadol, T#3</p> <p>Skelaxin, Zanaflex</p> <p>DEA schedule II N Stimulants Adderal, Vyvanse†</p> | <p>Sedative (herbal) § Valerian</p> <p>Neurontin, Lyrica</p> <p>Chantix</p> <p>Anti-tuberculosis</p> <p>Anabolic Steroid</p> | <p>Seizure, Neuro: Banzel, Cerebyx, Dilantin, Felbatol, Gabitril, Keppra, Tegretol, Depakote, Lamictal, Onfi, Sabril, Topamax, Tripletal, Zarontin, Zonegra,</p> | <p>Insulin †, Byetta</p> <p>Antiplatelet/PDI: Plavix, Pletal, Aggrenox, Ticlid, Effient</p> <p>Epipen</p> <p>COPD, Asthma</p> <p>Sedating Antihistamine: Benadryl, Zyrtec</p> | <p>RESTRICTED Potentially dangerous. Requires medical clearance.</p> |
| CAUTIONARY | <p>NSAID, Arthritis Aspirin, Motrin, Aleve, Mobic, Celebrex</p> <p>Tylenol, Excedrin</p> <p>Topical Pain Lidoderm, Voltaren, Capsaicin, Biofreeze</p> | <p>Melatonin</p> | <p>SSRI Antidepressants</p> <p>St John's Wort, Other Herbs §, Dietary Supplements, Energy Drinks</p> <p>Internet Prescriptions</p> | <p>Anti-Diabetic, oral</p> <p>Anti-Hypertensive</p> <p>Antihistamine, Non-sedating: Claritin, Allegra, Clarinex</p> <p>Prednisone, Prednisolone ¶</p> | <p>CAUTIONARY Examples of medication where Individual caution is recommended. If medication is newly started or experiencing side effects, check with Medic.</p> |

All personnel must report Dangerous and Restricted medication to the Offshore Medic or Occupational Health Nurse.

These medications may not be safe for offshore use or while performing emergency or safety sensitive duties. Rev 12/9/15

* List is not all inclusive. Medications that are not listed should be reviewed with the Medic including similar category or generic equivalents. Illicit drugs and chemicals, illegal medication including prescription medication without an individual prescription, and improperly used medication are strictly prohibited. See Medication Policy for further details.

† Adderal/Vyvanse Guideline outlines requirements for use and positive drug screen waiver for travel offshore

‡ Insulin Guideline outlines requirements for use offshore

§ Valerian (herbal) is used for sedation and is in restricted category.

¶ High dose Prednisone or Prednisolone (>20mg/d) or Dexamethasone (>3mg/day) may be dangerous offshore.



Appendix 1
Dangerous Restrictec

APPENDIX 2 Frequently Asked Questions

1. **What side effects of medications should I be concerned with when working offshore (ex: psychiatric medications, sedatives, relaxers, antidepressants, blood pressure, antibiotics, thyroid, and herbals)?**

Adverse effects of medications may include:

| | |
|---|---------------------------------------|
| Trouble sleeping, Nightmares | Drowsiness, Grogginess |
| Dizziness when standing | Blurred vision |
| Tremors | Jittery, Restlessness, Irritability |
| Headache | Nausea, Abdominal pain, Vomiting |
| Confusion | Excessive thirst |
| Extreme worry | Weakness and fatigue |
| Panic attacks | Fast or pounding heartbeat |
| Seizures, Blackouts | Slurred speech |
| Loss of Coordination | Muscle spasms or rigidity |
| Thinking or talking about hurting oneself | Aggressive or violent behaviors |
| Acting without thinking | Abnormal excitement, extreme activity |
| Any sudden or unusual changes in behavior | |

2. **Why am I not permitted to take sleeping pills while offshore?**

Individuals must be able to react in an emergency and not have trouble waking up. Sleeping pills may slow down reaction time of the individual. In addition, individuals have potential to have “hang over” effects the next day causing drowsiness and or “fuzzy headedness” leading to potential safety risks.

3. **What harm is it for me to take pain meds at night before bedtime?**

There is a potential to not be able to react quickly and clearly in case of an emergency.

4. **My doctor has prescribed me Adipex for weight loss; can I take it while offshore?**

No. Some potential side effects of this drug are insomnia, dizziness, restlessness, tachycardia, heart palpitations, and primary pulmonary hypertension. In addition, you may test positive on your initial drug test and be sent home.

APPENDIX 2

Frequently Asked Questions (continued)

5. Why is taking Chantix offshore a concern?

The US Coast Guard has issued an alert about this medication due to the potential side effects. Some of the reported side effects are: sudden loss of consciousness, seizures, muscle spasms, vision disturbances, hallucinations, paranoia and psychosis. This Medication is not recommended for those in highly safety sensitive jobs; for all others, it requires medical review prior to use offshore.

6. I am on a medication for anxiety or panic attacks, is this problematic?

Dangerous and Restricted medication for anxiety or panic attacks such as Valium, Librium, Xanax, Klonopin, buspirone, tricyclic antidepressants, and Monoamine Oxidase Inhibitors, must all be reported to the Medic. There is a potential for altered alertness, performance and response due to these medications. The status of the medical condition itself may also raise concern for issues around fitness for certain work.

7. How long must I be off my pain medication in order for a drug screen to not be positive?

This varies with individuals. Many factors unique to the individual being tested determine the actual elimination of the particular drug including such variables as age, weight, body fat index, sex, metabolism rate, overall health and amount of medication taken over a period of time. Talk to your pharmacist about the potential for causing a drug test to be positive. Generally, opiates take at least 2- 3 days or more to clear through your body.

APPENDIX 3

Frequently Asked Questions on Adderall or Vyvanse - Drug Testing and Medical Clearance

You are currently in the pool for BP's random drug and alcohol testing program. As such, you are subject to random drug testing prior to going to BP's offshore properties. If you test "non-negative" during a drug screen, you will be prohibited from traveling offshore until a complete drug screen has been conducted and a Medical Review Officer (MRO) determines that you have a valid explanation for the drug screen result. The complete drug screen and review by the MRO could take several days to complete.

Adderall or Vyvanse is a restricted medication for use offshore. Adderall or Vyvanse also contains amphetamines and may result in a "non-negative" result on a drug screen, and ultimately in a positive drug test result. As indicated above, this will result in you being restricted from offshore travel, causing a delay in your ability to start your scheduled assignment. In order to address this issue, the GoM Occupational Health Nurse (OHN) will prepare a letter, which notifies appropriate drug testing agents that you should not be restricted from off-site access if you test "non-negative" for amphetamines. You shall present this letter to the testing agent at the time of testing. To expedite the random drug and alcohol process, a copy of this letter shall be carried at all times when traveling offshore.

To obtain this medical clearance, you must provide valid and current contact information to the GoM OHN along with documentation of Adderall or Vyvanse use from your prescribing physician every 6 months. This note must include the drug name, dose and frequency and the physician statement, "approved for use in remote offshore environment." A copy of the medication policy can be provided to your physician to review. This information will also be provided to the MRO for use should he/she need to contact you while offshore. It is recommended that a copy of the prescription be in your possession at all times should the MRO request it.

Regarding contractors, the responsible case manager shall contact the GoM OHN for instructions regarding this policy. The contractor will be responsible to monitor their employees in regard to their Adderall or Vyvanse usage.

Please contact the GoM OHN at (Cell) 281.380.8416; (Fax) 866.417.7384; (Email) diana.haines@bp.com

APPENDIX
Sickbay Storage of Personal Medication

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Appendix 4 Sickbay
Storage of Personal Medication

APPENDIX 5
Personal Medication Dispensed from Sickbay



Appendix 5 Personal
Medication Dispensed

APPENDIX 6
Offshore Medication Clearance from Personal Physician



Appendix 6 Offshore
Medication Clearance

APPENDIX 7
Notice for Physician Regarding Offshore Work



Appendix 7 Notice
for Physician Regarding Offshore Work

APPENDIX 8
Medication Interim Safety Plan



Appendix 8
Medication Interim Safety Plan

APPENDIX 9
Offshore Medical Information Form



Appendix 9 Offshore
Medical Information Form