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1. OBJECTIVE

To outline Pilbara Ports' drug and alcohol standards, requirements and testing regime.

Alcohol and drugs can affect a person's ability to work safely. This includes medicines that are prescribed or over the counter. A person conducting a business or undertaking (PCBU) has a duty to keep workers and the workplace safe. This procedure assists Pilbara Ports provide a safe workplace and manage drug and alcohol related issues in.

2. SCOPE

A PCBU and all workers working for a PCBU for or on behalf of Pilbara Ports on a Pilbara Ports site or operation, and all vendors and visitors must comply with this procedure, unless exempted under section 7 of this procedure.

3. RESPONSIBILITIES

Table 1: Responsibilities

ROLE	RESPONSIBILITIES
Managers, supervisors, and emerging leaders.	Understand and comply with the requirements of this procedure. Ensure that personnel under their control are aware of, understand and comply with the requirements of this procedure.
Employees, vendors, and visitors.	Understand and comply with the requirements of this procedure and present fit to perform their role.

4. DEFINITIONS

Table 2: Definitions

TERM	DEFINITION
Line Manager	The person who is directly responsible for managing the work of someone else, and who is one level above that person.
Pilbara Ports site	Port land, seabed, and waters as gazetted under the <i>Port Authorities Act 1999</i> .

5. FITNESS FOR WORK

Pilbara Ports has a zero tolerance for alcohol and drugs. Persons must not commence work if they are not fit for duty if they are impaired by, within the impairment window, or under the influence of alcohol or illicit drugs. Persons must always maintain a blood alcohol content (BAC) of 0.000%.

6. VENDOR TESTING PROGRAMS

Vendors are required to implement and maintain their own comprehensive drug and alcohol testing and support programme for their employees and must meet the requirements of this procedure. A Pilbara Ports representative may request evidence of testing records, and these records must be made available immediately.

7. EXEMPTIONS FROM THIS PROCEDURE

The following exemptions apply to this procedure.

7.1 General exemptions

- Persons exempted under other legislation, i.e., Police Officers, Department of Agriculture Biosecurity Officers, Defence Force members, Department of Fire and Emergency Services personnel and Australian Border Force members; and
- Off duty seafarers, either returning to or departing from a ship alongside at a Pilbara Ports common user berth unless involved in an incident while inside the Pilbara Ports site, then the relevant section/s of this procedure shall apply.

7.2 Emergency exemptions

During an emergency, exemptions may be given to essential personnel to attend site under the influence of prescription drugs or alcohol, provided they undergo a risk assessment to confirm they can perform their duties safely and that risk assessment is signed off by:

- a member of the Pilbara Ports Executive;
- a Harbour Master; or
- a Deputy Harbour Master.

8. OWNED AND LEASED VEHICLES

The private use of a Pilbara Ports owned or leased vehicle is the responsibility of the driver. At all times the driver must be fit to drive and have a legal BAC reading for the license they hold. Drivers must adhere to [Road Traffic Act 1974](#).

Pilbara Ports owned or leased vehicles must not be driven following a non-negative or positive drug or alcohol test until approval is given by the person's line manager. *Pilbara Ports may not know the licence conditions of the person and there is the potential for the person's BAC to rise following a positive alcohol breath test (a person's BAC may continue to rise for up to 2 hours after their last alcoholic drink).*

9. MATTERS TO BE REFERRED TO THE HUMAN RESOURCES MANAGER AND DIRECTOR HEALTH AND SAFETY

Any matter relating to alcohol and drugs may be referred to the Human Resources Manager (HRM) or Director Health and Safety (DH&S). As a minimum, any of the following matters involving an employee must be referred to the Manager HRM, and any of the following matters involving a vendor or visitor must be referred to the HRM or DH&S:

- a positive evidentiary alcohol reading that returns a BAC equal to or greater than 0.050%.
- a person who is suspected of substituting or adulterating an oral fluid or urine specimen.
- refusal to submit to alcohol or drug testing.
- refusal to undertake counselling or rehabilitation.
- a positive evidentiary alcohol or confirmatory drug test, where there is a prior offence by the same person within 12 months.

- where a person declared a non-negative or positive result was due to a legal prescription or non-prescription medication, but confirmatory or evidentiary testing contradicts this.
- a person who does not comply with Pilbara Port's Code of Ethics and Conduct.
- a person who does not cooperate with a reasonable instruction of the Security Superintendent, Security Supervisor, contracted security guard or line manager.

Additionally, if a person returns a positive BAC less than 0.050% or a positive result to a drug test, and later wants to access site through another employer but their access card is still suspended, then the matter is referred to the Director H&S. If the person had a BAC equal to or greater than 0.050% then the matter is referred to the HRM. A positive result to a drug test may also be referred to the HRM.

Matters referred to the HRM involving a Pilbara Ports employee may be subject to an investigation with a recommendation provided to the relevant General Manager.

Matters referred to the HRM or DH&S involving a vendor or visitor will be subject to an investigation by their employer which must be submitted to Pilbara Ports for review upon request. Where there is no employer, or an employer does not provide an investigation then the matter may be considered by Pilbara Ports.

Any matter referred to the HRM or Director H&S may result in disciplinary action, including employment termination or site access being revoked. Such action will be at the discretion of the HRM or D H&S following consideration of any history, the current circumstances and surrounding areas, and any ongoing risk.

10. ENTERTAINMENT AND WORK-RELATED FUNCTIONS

Consumption of alcohol at work-related events outside of standard work hours is permitted. Refer to the Employee Gifts and Entertainment Procedure for information relating to Pilbara Ports supplied alcohol. Responsible consumption of alcohol is always required at all work-related events and the Pilbara Ports Code of Ethics and Conduct applies. The consumption of alcohol is not permitted at events such as offsite lunch breaks and team planning sessions.

11. PILBARA PORTS DRUG AND ALCOHOL TESTING

11.1 Pre-Employment Testing (employees)

It is a Pilbara Ports requirement that prospective employees submit to a drug and alcohol test as a prerequisite for employment with Pilbara Ports within 30 days prior to their commencement date. The result of such testing may be used as grounds for withdrawing an offer of employment.

11.2 Pre-mobilisation testing

Vendors are required to produce a negative drug and alcohol test within 30 days prior to the date of mobilisation and supply documented evidence to gain access to a Pilbara Ports site.

11.3 Blanket testing

Testing of all persons over a specific time or workgroup may be undertaken at the discretion of the Security Superintendent, HRM, or DH&S.

11.4 Post incident testing

A post-incident test may be required and must be triggered when a person's actions or failure to act may have contributed to the incident meeting the following threshold:

- A fatality or serious personal injury to an employee, member of the public or any other person.
- In situations where there has been a Significant Incident.
- The act of a driver or operator of a vehicle, mobile plant, vessel or aircraft resulted in injury or damage to property or equipment (including miss tips).
- There is reasonable suspicion or just cause that a person may be under the influence of alcohol, or drugs as otherwise outlined in section 21.1 of this procedure.

Post-incident testing must be conducted as soon as practicable after the incident. Where it is not practicable to conduct a test due to the lack of an available testing facility, the person's line manager must be notified.

In the event of personal injury, drug and alcohol testing must not compromise medical care.

11.5 For cause testing

For cause testing can be authorised by the Security Manager, HRM, or the respective line manager if:

- There is reasonable suspicion or just cause that a person may be under the influence of alcohol or drugs, either by the presence of drug paraphernalia or alcohol containers, or as otherwise outlined in section 21.1 of this procedure;
- A material change in work performance or work attendance, or any other irrational behaviour is observed;
- The person has returned a positive test result in the previous 12 months; or
- A person has otherwise contravened this procedure.

11.6 Site access and random testing

Entry to Pilbara Ports is conditional upon agreeing to random alcohol and drug testing. Pilbara Ports random testing program consists of two methods.

One method of selection for random drug and alcohol testing is via way of the Electronic Access Control System (EACS). A module within the EACS randomly selects personnel entering a Pilbara Ports site for testing, notifying the sites security team. There is a level of administration available within the EACS to enable random drug and alcohol generation. These functions are set and

determined by the Security Superintendent on advice from the Pilbara Ports Executive.

As a redundancy to the EACS selection, due to the system being unavailable either temporarily or permanently at a site, a random generator may be used. This random generator may be via a ball selection or from a random drug and alcohol test generating machine.

The second method of selection for random drug and alcohol testing is by testing for block periods of time at the discretion of the Security Manager or Security Supervisor.

The on duty contracted Senior Guard has discretion to temporarily suspend drug and alcohol testing for operational reasons.

11.7 Breath testing

All personnel must always maintain a BAC of 0.000% when accessing Pilbara Ports site or undertaking Pilbara Ports controlled works, for example, carrying out work activities for Pilbara Ports at residential premises.

During alcohol breath testing, selected persons are required to provide a breath sample from which a BAC is derived. Breath samples must be collected with and tested by a device, compliant to Australian Standard: AS3547:1997 – Breath Alcohol Testing Devices for Personal Use.

See Appendix 1 for a simplified version of the breath testing process.

11.7.1 Negative result (initial test)

If the BAC result obtained during initial testing is 0.000%, the person will be permitted to commence their normal duties.

11.7.2 Positive result (initial test)

Where a person returns a positive reading from an initial alcohol breath test, the person shall be required to wait at the alcohol breath testing location, or nearby, and must not undertake any tasks.

Note: Where a person returns a positive reading from an initial test and the tester believes the reading is likely due to equipment malfunction, the tester can retest the person using another breath testing unit. Before the retest occurs, the tester must inform the person that the reading obtained from the retest will be considered as the initial test result and that there will be no additional retest. If the retest returns a positive reading, then the person shall not be permitted to smoke, eat, or drink for 20 minutes, at which time the person shall be retested on a breathalyser as outlined below.

The person shall not be permitted to smoke, eat or drink for 20 minutes, at which time the person shall be retested on a *breathalyser*, being one which conforms to AS 3547-1997: Breath alcohol testing devices for personal use (Type 2 or Type 3). The result of this test shall determine the response as outlined in sections 11.7.3 or 11.7.4.

If the person who returns a positive result was driving a vehicle at the time of their initial test, then the following procedures also apply:

- If the BAC is less than 0.050%, the person is advised that they may park their vehicle, subject to the conditions of their driver's license. The person is not permitted to drive on site as part of parking the vehicle; or
- If the BAC is equal to or greater than 0.050%, they are instructed to leave the vehicle where it is. The driver may arrange for the vehicle to be moved by someone else. If the driver chooses to drive the vehicle anyway, it must be reported in accordance with section 9 of this procedure.

11.7.3 Negative result (evidentiary test)

If the BAC result obtained during evidentiary testing is 0.000%, the person will be permitted to commence their normal duties.

11.7.4 Positive result (evidentiary test)

If the BAC result of the evidentiary breath test remains greater than 0.000%, the following requirements apply:

- the person is not permitted to access Pilbara Ports site or undertake Pilbara Ports controlled works for a minimum of 24 hours, their access card is disabled, and their immediate line manager is notified by a member of the security team;
- the person may refer to their Human Resources (HR) department for advice on what leave entitlements may apply. In the instance of Pilbara Ports employees, annual leave or leave without pay will be appropriate;
- security shall offer to assist the person to arrange alternative transport from site. Security are to instruct the person not to drive, and inform the person that if they drive a vehicle after recording a result greater than 0.000%, they may be breaching the law. Note: some licence conditions require a BAC of zero;
- the person must be counselled by their employer. If the breach is from a vendor's employee, the relevant company must provide Pilbara Ports with documented evidence outlining what steps have been taken to prevent reoccurrence, before site access may be reinstated;

- on presentation to site after the 24 hours stand down period, the person is required to provide a 0.000% BAC result to have their Pilbara Ports access card reinstated. Note: at the Perth and Karratha Office, the person may use the self-test unit with a General Manager or delegate as a witness; and
- a confirmatory breath test email is prepared by the security team and sent to the person's line manager, the HRM and the DH&S, with the positive result recorded, required actions, and a note that future breaches of the Fitness for Duty Alcohol and Drugs Procedure may result in disciplinary action.

When the above items have been addressed to the satisfaction of the Security Manager or the Security Supervisor, site access may be reinstated. When the above matters cannot be addressed to the satisfaction of the Security Supervisor or the Security Manager, they may be referred to the HRM or DH&S under section 9 of this procedure.

11.8 Drug testing

Oral fluid screening is utilised as the primary indicative and confirmatory tests, to screen for the presence of prescribed or non-prescribed drugs, including synthetic cannabinoids. If for religious, personal, or physical reasons a person cannot or does not wish to undertake oral fluid testing, they may elect to undertake a urine screen. The oral and urine methods must be in accordance with AS/NZ 4760:2019 – Procedures for specimen collection and the detection and quantitation of drugs in oral fluid, or AS 4308:2008 – Procedures for specimen collection and the detection and quantitation of drugs of abuse urine.

See Appendix 2 for a simplified version of the drug testing process.

11.8.1 Negative result

If the primary indicative test result indicates a negative result, the person will be permitted to commence their normal duties.

11.8.2 Non-negative result

If the primary indicative test result is non-negative, the following requirements apply:

- the person shall be required to provide a sample for confirmatory laboratory urinalysis. The sample is then sent to a laboratory for confirmatory testing regardless of its result;
- the person is not permitted to access a Pilbara Ports site or undertake Pilbara Ports controlled works until confirmatory test results are returned, their access card is disabled, their line manager and the HRM is notified by a member of the Security team;

- security shall offer to assist the person to arrange alternative transport from site, instruct the person not to drive, and inform the person that if they drive, they may be breaching the law; and
- the person may refer to their Human Resources (HR) department for advice on what leave entitlements may apply. In the instance of Pilbara Ports employees, annual leave or leave without pay will be appropriate. In the instance that confirmatory testing is negative, leave taken shall be reinstated.

If a person chooses to submit to a urine screen in place of oral fluid as their primary indicative test and the result is non-negative, that sample may be used for confirmatory testing on the basis that the sample provided was adequate.

If a person returns a non-negative result and states that it is the result of a legal prescription or non-prescription medication, then section 11.8.4 of this procedure applies.

See Appendix 3 for the preliminary screen to confirmatory testing process.

11.8.3 Confirmatory testing

All non-negative samples must be submitted to a NATA approved laboratory for confirmatory testing.

Where the analysis verifies the presence of an illegal drug (positive result), the following requirements apply:

- an email is prepared and sent to the person's manager, the HRM and the DH&S by a member of the Security team, with the positive result recorded, required actions, and a note that future breaches of the Fitness for Duty Alcohol and Drugs Procedure may result in disciplinary action;
- the person must be counselled by their employer. If the breach is from a vendor's employee, the relevant company must provide Pilbara Ports with documented evidence of the steps taken to prevent reoccurrence before site access may be reinstated;
- the person is required to attend counselling for drug and dependency issues within three months from the date of the breach. If the person refuses counselling, the HRM may instruct that access to all Pilbara Ports sites be withdrawn;
- the person is to submit to at least two (2) additional drug tests over the following twelve months, in addition to participation in the random testing program. The two additional drug tests must be at least four months apart. It is the responsibility of the person who tested positive to arrange additional tests. Test results shall be sent to the Security team for tracking; and

- the person is required to provide the Security Manager evidence of a negative result in the form of a Certificate of Analysis from a NATA laboratory, inclusive of a declaration that the sample was collected and tested in accordance with AS/NZ 4760:2019 – Procedures for specimen collection and the detection and quantitation of drugs in oral fluid, before site access may be reinstated.

When the above items have been addressed to the satisfaction of the Security Supervisor or Security Manager, site access may be reinstated. When the above matters cannot be addressed to the satisfaction of the Security Supervisor or the Security Manager, they may be referred to the HRM or DH&S under section 9 of this procedure.

Where the analysis confirms the test as positive, consistent with declared medication, then the test result is to be provided to the employer for forwarding to the employee. The person's access is to be reinstated if the person's line manager has deemed any risk can be appropriately managed.

If the person had earlier declared the non-negative result was due to a legal prescription or non-prescription medication and they had been granted site access (as per section 11.8.4 of this procedure) but confirmatory testing contradicts this, site access shall be suspended, and the matter referred to the HRM.

11.8.4 Prescription and non-prescription medication (non-negative)

If a vendor returns a non-negative result under section 11.8.2 of this procedure, their employer can apply to have them return to Pilbara Ports, pending the return of laboratory confirmatory testing. This application is made by submitting the Prescription and Non-Prescription Non-Negative Risk Assessment form. This form can be approved by Security, HRM or DH&S, if they believe the result is indicative of the stated medication, there are no other associated risks and are satisfied that the company has conducted their own internal risk assessment.

If an employee declared a legal prescription or non-prescription medication at the time of the test, states that the non-negative result is due to that legal prescription or non-prescription medication and wants to access site /conduct work, site access can be given if their line manager agrees. The line manager shall consider the medication and its potential effects, the person's work activities, and the potential risks when making the decision if the person can return to work.

12. OTHER CONSIDERATIONS

Disclosure of over the counter and/or	To protect individuals' medical confidentiality, Pilbara Ports does not require individuals to disclose over-the-counter medication or prescription drugs (for purposes of these "Other Considerations",
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<p>Prescription medication</p>	<p>collectively referred to as “medications”) unless one of the following situations apply:</p> <ul style="list-style-type: none"> • The medication may affect the individual’s ability to safely perform work (i.e., some medications warn of drowsiness or caution regarding the operation of a motor vehicle or machinery); • The medication may influence first aid and emergency response (e.g., anti-coagulants can lead to significant blood loss in the event of injury); or • Point of collection devices are used and a non-Negative test result is reported. In these situations, the individual may be prompted to document medications on the chain of custody form; • Upon disclosure of medication, individuals are not required to disclose their diagnosis or medical history to their line manager or other non-medical professional. <p>Supporting our efforts to ensure individuals are fit for work, disclosure of medication may be required in the following situations:</p> <ul style="list-style-type: none"> • During baseline and periodic medical examinations. • During injury/illness treatment and case management.
<p>Prescription Cannabis Use</p>	<p>While Pilbara Ports respect the legal use of medical cannabis, it is important to ensure that all workers are fit for duty, can perform their work safely, and are not within the impairment window for THC.</p> <p>The presence of THC in a worker’s system, even if prescribed, may impact their ability to perform certain tasks safely and therefore will be treated as a positive test result.</p>
<p>Employee Assistance Program</p>	<p>Employees with substance use disorders or dependency issues or who believe they are unable to comply with this procedure are encouraged to contact the Employee Assistance Program (EAP) for confidential assistance.</p> <p>Employees who voluntarily disclose a substance use disorder or dependency issue prior to a violation of this procedure will not be disciplined but will be referred to the EAP for an independent assessment and customised treatment program.</p> <p>Use or prospective use of the EAP does not exempt or excuse a violation of the procedure. If an employee volunteers to participate in the EAP after a violation of the procedure, such action will not affect Pilbara Ports right to administer discipline, up to, and including, termination of employment.</p> <p>The EAP treatment program may require counselling, rehabilitation and/or follow up testing, and Pilbara Ports will receive updates on compliance with the treatment program. An employee who has a positive test result or does not adhere to the treatment program may be subject to disciplinary procedures.</p> <p>Vendors and consultants are not eligible to participate in Pilbara Ports EAP program, but may offer their own to their employees.</p>

13. REFUSAL TO SUBMIT TO TESTING, COUNSELING OR REHABILITATION

Refusal to submit to alcohol or drug testing shall be treated as a positive result, and action, including possible disciplinary action, taken accordingly.

Where a person refuses to participate in counselling or rehabilitation as requested, the consequences, including possible disciplinary action and denial of access to site, shall be explained to the person.

Refusal to submit to testing, counselling or rehabilitation shall be referred to the HRM.

14. TAMPERING

A person who is suspected of substituting or adulterating an oral fluid or urine specimen shall have their site access suspended and the matter shall be referred to the HRM for investigation. Subsequent laboratory analysis of the associated oral fluid or urine specimen will be conducted.

If the tampering is proven, the person will be denied entry to Pilbara Ports. Pilbara Ports employees may have their employment terminated.

15. PAYMENT OF TESTING COSTS

Pilbara Ports shall pay the cost of pre-employment testing for their employees. Pilbara Ports shall also pay the cost of initial and confirmatory testing for persons when that testing is done under sections 11.2, 11.3, 11.4 and 11.5 of this procedure.

Following a confirmed positive drug result, Pilbara Ports will pay the cost of one re-test for their employees on advice from the employee that they are confident they can return a negative result. If the person returns yet another positive result, all arrangements for and costs of subsequent tests relating to the original positive result shall be borne by the individual.

Non-Pilbara Ports employees or their employers shall be required to organise and pay the costs of subsequent tests relating to the original positive result.

16. SELF-TEST

Alcohol and drug test kits are available to use. These kits are provided to help maintain a safe and healthy work environment. Workers can utilise these resources as needed to ensure fitness for duty. These self-test kits are available at:

- Port of Ashburton
- Port of Dampier
- Port of Port Hedland Eastern Harbour
- Port of Port Hedland Utah Point
- Karratha Office
- Perth Office

Personnel are not required to notify their line manager of their desire to self-test.

17. CONFIDENTIALITY AND RECORDKEEPING

Pilbara Ports shall maintain appropriate confidentiality in all matters relating to this procedure and all records shall be kept in accordance with the Record Keeping Plan. Drug and alcohol results and correspondence shall be stored in Pilbara Ports document management system that is secured from general access and is managed by the Security team. Human Resources related records shall be held on the employee's personal file.

18. CALIBRATION OF TESTING EQUIPMENT

Equipment used for alcohol breath testing shall be calibrated in accordance with Australian Standard: AS 3547:1997 – Breath Alcohol Testing Devices for Personal Use, and records maintained.

19. FALSE READINGS ON HANDHELD UNITS

A handheld BAC unit's sensitivity can sometimes result in a "false positive" test. This can be as a result of exposure to a number of external influences. If a tester believes that a "false positive" has occurred, the tester can complete a second BAC test using another handheld BAC unit immediately.

If the outcome at the completion of a second hand-held test is positive, then the donor will require an evidentiary test to be completed in accordance with section 11.7 of this procedure. For clarity, the evidentiary test will be completed after 20 minutes from their first initial test.

20. LABORATORY ACCREDITATION

The recognised standard for the collection, storage, handling, and dispatch of a urine sample for testing by a laboratory is AS/NZS 4308:2008 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine. The recognised standard for the collection, storage, handling, and dispatch of an oral fluid sample for testing by a laboratory is AS/NZ 4760:2019 – Procedures for specimen collection and the detection and quantitation of drugs in oral fluid.

A laboratory's compliance to these standards is voluntary, and their choice not to comply with a standard does not undermine its accreditation by the NATA. Therefore, accreditation by NATA does not automatically mean that a laboratory is accredited to comply with the relevant Australian Standard.

Pilbara Ports requires that a laboratory be NATA accredited and comply with the relevant standard. The method of analysis is generally described on the Certificate of Analysis which is prepared by the laboratory.

21. DRUG OR ALCOHOL ABUSE PROBLEMS

21.1 Common indicators of possible alcohol or other drug problems

Here are some common indicators of possible alcohol

Behavioural Changes	<ul style="list-style-type: none"> ▪ Unexplained mood swings or irritability ▪ Decreased productivity or job performance ▪ Increased absenteeism or frequent lateness ▪ Uncharacteristic risk-taking behaviours ▪ Neglect of responsibilities
Physical signs	<ul style="list-style-type: none"> ▪ Bloodshot eyes or pupils larger or smaller than usual ▪ Sudden weight changes ▪ Poor personal hygiene or appearance ▪ Unusual smells on breath, body, or clothing ▪ Tremors, slurred speech, or impaired coordination
Psychological indicators	<ul style="list-style-type: none"> ▪ Confusion or difficulty concentrating ▪ Memory problems or blackouts ▪ Paranoia or unexplained anxiety ▪ Sudden changes in social circles or isolation
Workplace indicators	<ul style="list-style-type: none"> ▪ Frequent accidents or near-misses ▪ Decline in the quality of work ▪ Unexplained absences during work hours ▪ Using break time excessively or inappropriately ▪ Unusual behaviour or interactions with colleagues
Personal and social indicators	<ul style="list-style-type: none"> ▪ Strained relationships with family, friends, or coworkers ▪ Financial problems due to spending on substances ▪ Legal issues related to substance use ▪ Loss of interest in activities previously enjoyed

22. REFERENCES

AS 3547:1997 – Breath Alcohol Testing Devices for Personal Use

AS/NZS 4308:2008 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine

AS/NZ 4760:2019 – Procedures for specimen collection and the detection and quantitation of drugs in oral fluid

Code of Ethics and Conduct

Equipment Calibration Procedure

Fitness for Duty – Drug and Alcohol Policy

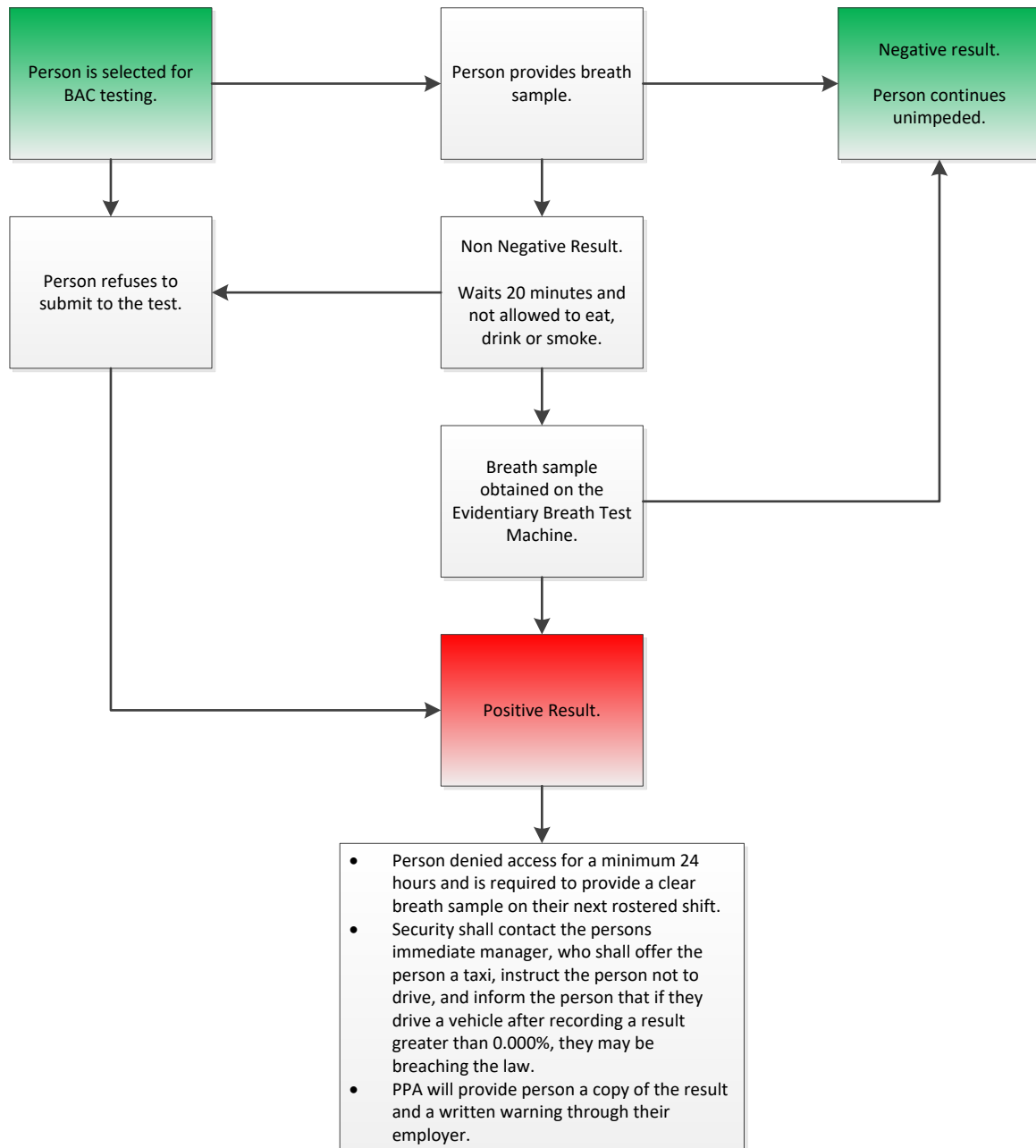
Prescription and Non-Prescription Non-Negative Risk Assessment Form

Recording Keeping Plan

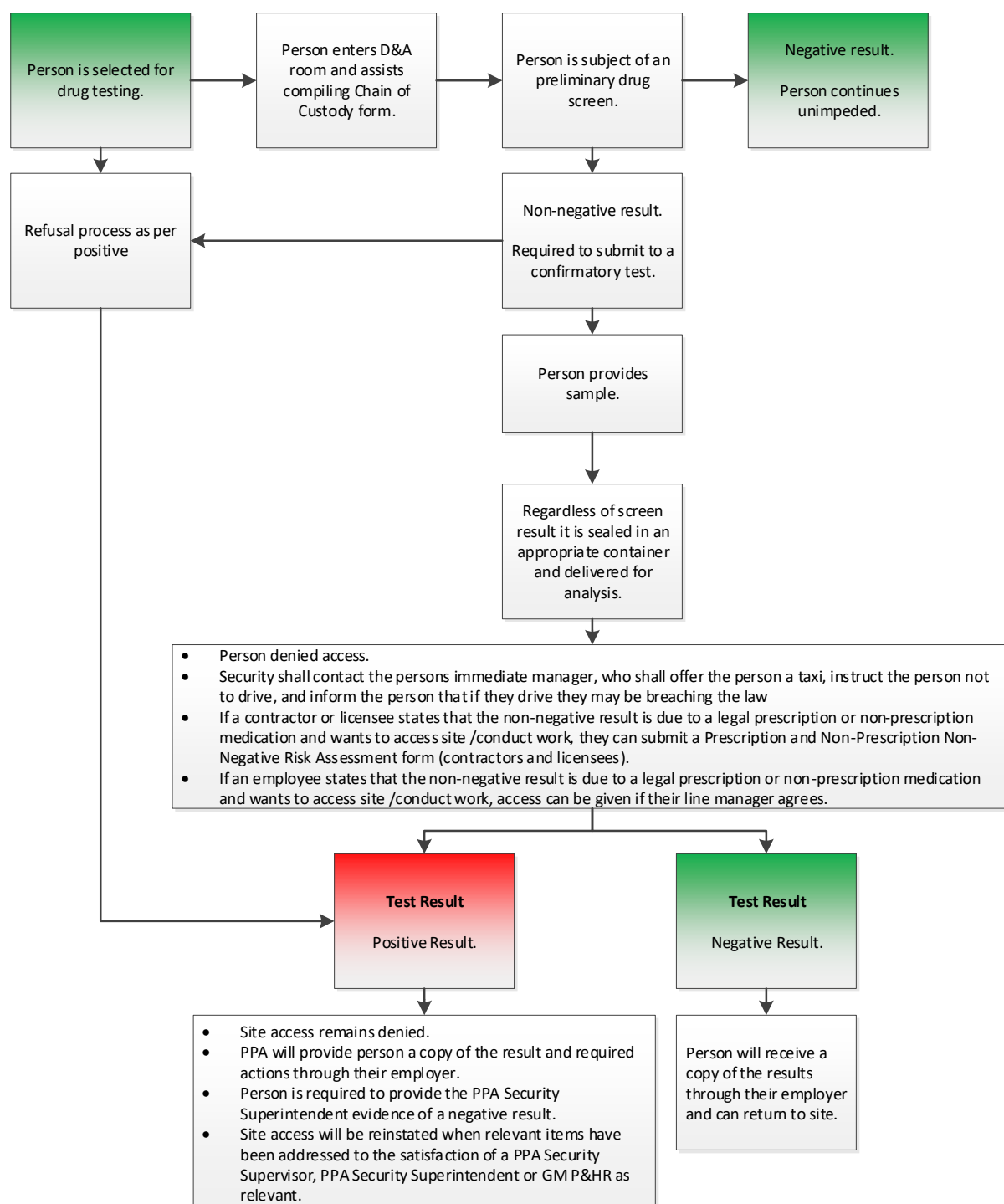
23. PROCESS OWNER

The Director Health and Safety is responsible for this procedure.

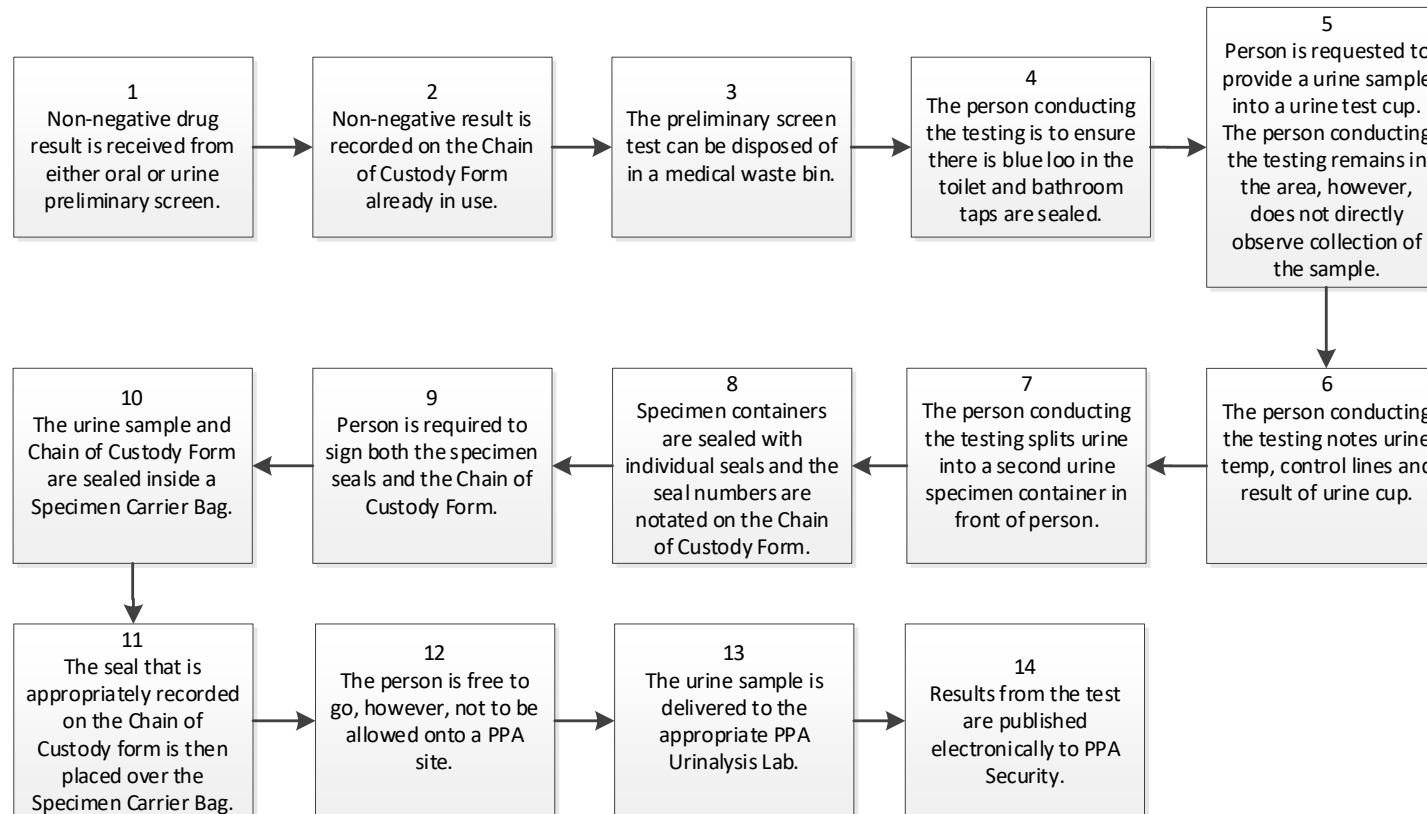
APPENDIX 1 - ALCOHOL BREATH TESTING PROCESS (SIMPLIFIED)



APPENDIX 2 - DRUG TESTING PROCESS (SIMPLIFIED)



APPENDIX 3 - PRELIMINARY SCREEN TO CONFIRMATORY URINE TESTING



APPENDIX 4 – PRELIMINARY SCREEN TO CONFIRMATORY ORAL TESTING

