

Drug and Alcohol Policy

1.0 Objective

Waste Management NZ Ltd and its subsidiaries ("WM") recognise that the highest standards in health and safety are crucial to the success and sustainability of our business and is committed to the safety of all employees, contractors and customers through a zero tolerance policy to alcohol and drugs in the workplace. The Policy applies to employees and, contractors, subcontractor's agency workers and owner drivers("Workers") conducting work for WM on WM sites or customer's sites are bound by this Policy.

2.0 WM achieves the objective by -

- a) Having a zero tolerance to drugs and alcohol in the workplace.
- b) Communicating with employees and contractors on their workplace health and safety obligations in relation to drugs and alcohol.
- c) Providing adequate resources to ensure the successful implementation of this Policy including access to an [Employee Assistance Program](#).
- d) Providing relevant [rehabilitation](#) and awareness to WM employees, to assist in fulfilling their roles and responsibilities under this Policy.
- e) Providing persons attending a WM workplace, or working under its operational control, awareness of and access to this Policy.
- f) Ensuring confidentiality is maintained at all times in respect of these matters.
- g) Undertaking pre-employment, random, post-incident and reasonable suspicion testing for drugs and alcohol.

3.0 Interpretation

For the purposes of this Policy ("work") includes attending workplaces (travelling to and from a place of work), reporting for work and undertaking work activities during working hours. A ("workplace") is a company site at any time and a company vehicle during working hours (this includes travelling to and from work).

If you have access to a WM owned or leased vehicle which can be used for personal use, the conditions of this policy apply at all times when using those WM owned or leased vehicles.

For the purposes of this Policy and the [HSEQ QRG 3.2.1.04 Drug and Alcohol Screening Protocols Quick Reference Guide](#), the "Cut Off" levels for drug use are based on Australia and New Zealand Standards for specimen collection and detection; AS4760-2019 (oral fluids) and AS/NZS4308:2008 (urine).

For all Breath Alcohol testing, WM has set the detection level at 0 (zero) for the workplace. This means any breath alcohol level above 0 (zero) could result in disciplinary action being taken.

4.0 Testing for Drugs and Alcohol in the Workplace

Reasonable cause or post incident testing can be undertaken by either -

- An authorised site representative who has completed an approved training course in using saliva testing kits and breath alcohol testing kits (no authorised site representative can complete urine testing). Refer to HSEQ QRG 3.2.1.04
- WM approved testing contractor (TDDA) or approved medical centre

Random selection testing can only be completed by WM approved testing contractor (TDDA).

Systematic Selection testing can only be completed by WM approved testing contractor (TDDA).

Pre-employment testing must be completed by WM approved testing contractor (TDDA), or an approved medical centre.

5.0 Testing Methods

The following testing methods are approved by WM -

- Pre-employment drug testing is completed by urine sample only.
- Random drug testing is completed using saliva test kits. If a person is unable to provide a saliva sample due a medical condition or other reason, urine testing will be completed.
- Post Incident or Reasonable Cause drug testing is completed using saliva test if the test can be completed within 4 hours of the event. If testing cannot be completed within 4 hours of the event, urine testing will be completed.
- Systematic Selection drug testing will be completed in alignment with the requesting customer or client requirements.
- All breath alcohol testing will be undertaken using an approved breath alcohol testing device.

Note - Inhalants and prescription drugs fall into the “substances” category. These will require a urine or blood test if under pre-employment. If detected during reasonable cause, or post incident, saliva or urine (time dependent) testing will be completed as per HSEQ QRG 3.2.1.04.

6.0 Definitions

The following definitions apply to this Policy, and the [HSEQ ORG 3.2.1.04 Drug and Alcohol Screening Protocols Quick Reference Guide](#), and the Drug and Alcohol screening forms listed in the Protocol -

Drugs means Prohibited Substances and Impairing Substances.

AMP – Amphetamine	MET – Methamphetamine	OPI – Opium
BEN – Benzodiazepines	MOR – Morphine	OXY – Oxycodone
COC – Cocaine	THC – Marijuana	PCP – Phencyclidine

Prohibited Substances means -

- any controlled drug as defined in the [Misuse of Drugs Act 1975](#) (“MODA”), except when possessed or used in accordance with the MODA; or
- any prescription medicine, except when used or possessed under prescription (in accordance with the [Medicines Act 1981](#) and [Medicines Regulations 1984](#)); or any psychoactive substance, other than an approved product as defined in the [Psychoactive Substances Act 2013](#).

Impairing Substances means any substance which may be lawfully sold, possessed, or used, but which has the ability to compromise safety by impairing the judgement, physical coordination, reaction time or concentration levels of those consuming, ingesting or otherwise taking the Impairing Substance, including, without limitation:

- medicines and / or controlled drugs (when not used in accordance with the Medicines Act and / or is a breach of the MODA); or
- approved products as defined in the Psychoactive Substances Act; or
- Alcohol.

Negative Test means a test where the result indicates the level of alcohol and/or drugs in a person’s system do not exceed cut-off levels.

Non-negative Test means a test which indicates that the level of alcohol and/or drugs in a person’s system has exceeded cut-off levels but where confirmation testing has not yet been completed. After confirmation testing is complete the test result will be reclassified as either negative (not confirmed) or positive (confirmed).

Positive Test means a test which indicates that the level of alcohol and/or drugs in a person’s system has exceeded permissible levels where confirmation testing has been completed. In the case of alcohol, confirmation testing would involve a second breath test. In the case of drugs, confirmation testing would involve testing of the split urine sample by an accredited testing laboratory.

Zero Tolerance means the zero-tolerance level for other Prohibited and Impairing Substances will mean a level not exceeding the levels outlined in Drug Tolerance Cut-Off Levels: AS4760:2006 and AS/NZS 4308:2008.

7.0 WM Managers and Supervisors must -

Ensure that confidentiality is maintained of their workers test results and work with their People and Culture Partner when an escalation is required for any issues arising, related to this Policy.

8.0 All workers working for WM and attending our workplaces must -

- a) Ensure they do not work or intend to work under the influence of drugs or alcohol. This must be demonstrated by a negative drug and alcohol test on request.
- b) Never drive or operate any WM owned or leased vehicle, or item of plant (fixed or mobile) while under the influence of drugs (includes certain medications like Tramadol) or alcohol. This includes driving to and from a place of work.
- c) Submit to Drugs and Alcohol testing as requested in accordance with WM's policies, processes, and procedures.
- d) Notify their supervisor or a company representative if they feel unsafe working with one of their work colleagues, because they suspect he / she is in breach of this Policy.
- e) Notify their supervisor or a company representative if they are taking drugs or medication prescribed by a medical practitioner that might impair performance i.e. Tramadol. If appropriate, alternative duties will be assigned on a temporary basis.
- f) If working on a client's site and the worker is under the influence of drugs or alcohol, the worker must comply with the Client's HSEQ Policies and must submit to a Drug and Alcohol test if requested by the Client.

9.0 Compliance with Policy

- a) Non-compliance with this Policy may result in performance management action which could include mandatory [rehabilitation](#) processes, reallocation of work duties and responsibilities or termination of employment without notice.
- b) The use of Impairing Substances may be allowable, if WM considers that they are consistent with safe performance of the individual's duties and are being used at the prescribed dosage, if any. The company reserves the right to obtain a professional medical opinion on whether the substance will impair job performance or safety.
- c) Should a worker refuse a lawful and reasonable request to submit to drug / alcohol testing, the refusal to comply may result in disciplinary action, If the manager, after considering reasons given, believe the request is appropriate in the circumstances, please contact your People and Culture Partner for advice or investigation as required
- d) Should a non-employee refuse to submit to drug / alcohol testing while engaged in activities on WM's behalf, and where the request is lawful and reasonable, refuse them access to the WM site. Where safety concerns exist, the site manager should ensure that arrangements are made (preferably with the service provider company) to have the person taken home or elsewhere, where reasonable care can be provided as appropriate in each case; safety being an essential requirement.

10.0 Confidentiality and the [Privacy Act 2020](#)

- a) All information gathered in connection with testing for Prohibited or Impairing Substances, or in participation of rehabilitation or treatment is collected for the purpose of implementing this Policy and ensuring compliance with this Policy.
- b) All information will be held by People Culture and/or the Head of Safety and Risk, and will be held for

the duration of the individual's employment / engagement or longer, where deemed necessary by WM.

- c) Relevant information may be disclosed to the relevant employee's Supervisor and/or Branch Manager.
- d) No information relating to any testing or rehabilitation will be disclosed to an external party without the prior written consent of the individual concerned.
- e) If the employee disputes the test result, they can at their own cost, request a sample for their own analysis.

This Policy will be reviewed annually.



Approved by the Managing Director

Date: 08 August 2023