

# US T&P Fatigue Management Policy

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## 1. Purpose

The purpose of this policy is to highlight the effects and risks of employee fatigue, the shared responsibility to manage it appropriately, the preventative actions that should be planned and taken to minimize the associated risks, to include establishing hours of service limitations.

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## 2. Scope

The policy applies to all employees, and contractors, while performing on duty work or carrying out activities on behalf of BP, to include:

- Those who work at offices, facilities, or remote areas supporting the pipeline system
  - Those who work remote sites requiring lengthy drives
  - Those who undertake driving as part of their roles
  - Those who undertake business travel which includes air travel and rental vehicles as part of their roles
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## 3. Roles and Responsibilities

### 3.1 Team Leaders

1. Must ensure the health and safety of all workers on all job sites.
2. Take all reasonable measures to eliminate or mitigate the risks of fatigue.
3. Review annually, in conjunction with a review of hazard assessments, the effectiveness of actions taken to minimize or eliminate fatigue in the workplace and make improvements to local procedures or process, as required.
4. Take all steps reasonable to prevent a worker from working excessive hours.

### 3.2 Employees/Contractors

1. Arrive at work adequately rested and prepared for on duty work.
2. Recognize personal limits.
3. Self-report any concerns related to fatigue prior to work commencing or during work activities.
4. Keep track of work hours and inform your Team Leader if you are near hours of service limits (Defined in Section 6).

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## 4. Workplace Risk

The first step in mitigating fatigue in the workplace environment is to identify risk that impact fatigue. Workplace environment, schedules, staffing levels, at home activity are the areas that primarily affect fatigue. Adequate staff level to complete job task reduces extra work upon individuals and minimizes the effect of fatigue. Scheduled activities, their frequency or deemed importance can place additional stress upon an employee. Clearly stated expectations of daily work, projects, response to abnormal field events all can reduce fatigue. Activities away from work can impact the individual and play a part in workplace fatigue. Ensure that you are well rested and mentally prepared for your commute to work and the following activities you encounter during the day.

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## 5. Fatigue Signs, Effects and Mitigation

It is important that fatigue - as well as its signs, effects, and remedies – be clearly defined. Fatigue is described as an acute and ongoing state of tiredness that leads to mental and/or physical exhaustion and prevents people from functioning within normal boundaries. It is normal to feel tired after prolonged mental or physical effort at work. Fatigue, however, is more than just feeling tired.

Fatigue can accumulate over time, and may be caused by:

- Work-related factors such as length of time worked, inadequate rest breaks and/or sleep, harsh environmental conditions
- Lifestyle factors such as poor quality of sleep, family responsibilities, social life, commuting time to and from work
- A combination of work-related and lifestyle factors

Signs of fatigue may include:

- Headaches and/or dizziness
- Difficulty keeping eyes open
- Constant yawning
- Muscle weakness
- Lacking energy

Immediate effects of fatigue may include:

- Lack of concentration
- Reduced short-term memory
- Increased errors
- Slower reaction times
- Impaired decision-making and judgment (including being unaware of the state of fatigue)
- Reduced immune system function

Longer-term effects of fatigue may include:

- High blood pressure and/or heart disease
- Depression and/or anxiety
- Diabetes and/or gastro-intestinal disorders

## Fatigue Mitigation

### Sleep

Sleep is the only effective long-term strategy to prevent and manage fatigue. While tired muscles can recover with rest, the brain can recover only with sleep. An adult generally requires seven to eight hours of sleep daily, taken in a single continuous period. When individuals get less sleep than they need in a day, they build up a sleep debt. Each additional day without enough sleep increases the debt which, when it becomes large enough, causes fatigue. The only way to reduce or cancel a sleep debt is by sleeping additional hours. In the DOT pipeline control centers, regulation requires that the pipeline controllers have a work schedule that allows for 8 hours of continuous sleep. Employees and contractors should be afforded 8 hours of continuous sleep.

### Rest periods

Established rest periods taken throughout the workday provide time to recover from work activities and relieve stress. Stress is associated with fatigue and plays a part in the effect on fatigue. Workers should take the time for lunch breaks away from the desk or from inside work vehicles whenever possible. A 15-minute break to stop work in harsher conditions i.e., heat, cold, loud machinery can have immediate effects upon the worker and is recommended at periodic intervals.

### Establishing work limitations

Work limitations which include 'not to exceed' hours provide an environment that aids in fatigue managing. Establishing work limitations either by policy direction or specific to jobs prior to work started can relieve any doubt or confusion managing a person's well-being when it comes to fatigue. Scheduling work activities is also an integral part of managing fatigue. Clearly defined job types or maintenance planning managed; accordingly, will not cause excessive hours, or conflicts with other priorities. Use of scheduling tools can aid and identify ahead of time if an employee will be working excessive hours.

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## 6. Policy

### Working Requirements

Hours of service or on duty work shall not exceed 14 hours in any 24-hour period. The hours-of-service limit of 14 hours include the commute to and from the work site.

Do not work over 60 hours during a 7-day continuous period. If exceeded, a minimum of 24 hours off from the work environment is mandatory.

### Driver Requirements\*

Do not drive more than 10 hours of service within a rolling 24-hour period.

The maximum driving time before taking a break is 4.5 hours. After driving 4.5 hours a 30 min break is mandatory.

Attempt to take 15 min breaks for every 2 hours of driving.

\*Refer to the BP Guide 500149 Downstream and Other Business & Corporate (OB&C) Driving Safety Guide

### Business Travel Requirements

Business travel that includes the use of a personal vehicle or rental car, commute travel to and from the airport from home, work site, hotel, rental agency, and any aircraft flight time; shall not exceed 14 hours in a rolling 24-hour period.

### Exceeding Hours of Service

Under extraordinary situations or emergency events hours of service may be in jeopardy of being exceeded and must be discussed with your Team Leader and approved by the District Operations Manager or Construction Manager prior to continuing work. During this conversation, effects of continued work past the hours of service should be discussed, additional risks identified and understood. If possible, implore fatigue mitigation strategies such as mandatory break period, stimulation, check-in upon fatigue status, and alternate plans for driving, or sleep accommodations after the work is completed. Follow up documentation or next day email pertaining to work-related event(s) can detail any related hours-of-service exceedance.

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## 7. Employee Information and Training

Employees can contact the Health Service Advisor for any issues, concerns or questions related to their well-being due to fatigue.

Online training courses:

The Importance of Good Sleep training modules are available through the MyTalent & Learning system. Two specific modules titled “Understanding & Managing your Sleep Health” and “Managing Fatigue” are highly recommended.

The Driver Safety Training & Fatigue Management CBT online training course is a one-time requirement for new employees.

Educational resources:

BP Guide 500149 Downstream and Other Business & Corporate (OB&C) Driving Safety Guide.  
FCTRL-OPS-463-009 Fatigue Risk Management System (Control Centers).

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