

Hazard Assessments – Federal and Provincial

COR/SECOR-compliant processes for formal and site-specific hazard assessments and a federal/provincial legislation comparison

Overview

Parts 1 and 2 of this bulletin provide employers with a short, step-by-step guide to formal and site-specific hazard assessments based upon AMTA's Certificate of Recognition (COR) program. COR and SECOR holders have hazard assessment requirements that go beyond legislated requirements, so these parts have been aligned with AMTA's Health and Safety System Building course and COR and SECOR auditor guidelines.

Part 3 provides a side-by-side comparison of the legislative requirements for both federally and provincially regulated employers. All employers can use this section to view their minimum hazard assessment requirements, regardless of COR/SECOR and provincial/federal status.

Part 1 - How to Conduct Formal Hazard Assessments

Formal hazard assessment is a process employers use to identify hazards in their operations. It is a documented, independent activity that is the foundation of a company's safety system. The following steps outline how an employer do their formal hazard assessments. [1]

1. List all the jobs

The first step is to list (i.e., inventory) all the different jobs at the company. There may be more jobs than there are people; for example, a small employer may have a heavy-duty technician who is also a driver, or maybe the salesperson also dispatches and occasionally does some basic maintenance.

2. Identify tasks and steps for each job

The tasks that make up each job then need to be identified. Tasks are specific activities that make up a job. For example, a dispatcher will have several tasks that make up that position, and these tasks may be computer work, making calls to customers, making calls to drivers, and being on-call. The job of driver will have different tasks such as performing a vehicle inspection, urban driving, highway driving, and tasks related to using auxiliary equipment like an end dump semi trailer.

3. Identify hazards for every task

Once tasks have been identified for each job, the next step is to identify health and safety hazards for each task. Health hazards are things in the environment that can cause immediate and long-term health problems. Examples include airborne silica dust, exhaust fumes, and working with solvents. Safety hazards are things that can cause immediate physical injury. Examples include moving machinery, falling from heights, and vehicle collisions.

There are four categories of health and safety hazards that must be considered for each task. They are chemical (cleaners, solvents, fumes, etc.), physical (falling from heights, moving machine parts, heavy exertion, etc.), biological (bacteria, viruses, mould, etc.), and psychological (bullying, harassment, stress, etc.). Workers need to be involved in this step because they have a deep understanding of the hazards they face.

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4. Rank hazards based on risk

Hazards need to be ranked based on risk once they have been identified. This should be done for each hazard and the risk ranking must be based on at least two factors, such as the severity of contacting a particular hazard and the likelihood someone will contact it.

5. Eliminate or control hazards

Regardless of risk, each identified hazard must be eliminated or controlled. In this step, the employer thinks of ways people can be protected from each hazard and records them. The best thing to do is eliminate a hazard; that way, it poses no risk to anyone. However, if this is not possible, controls need to be put in place to protect people. These controls can take the form of substitution (replacing whatever is causing the hazard with something less dangerous), engineering (redesigning the process or equipment to reduce the hazard's risk), administrative (training, procedures, and signs meant to direct people to behave in a safe manner), Personal Protective Equipment (PPE) (items worn by workers that protect them after they have contacted a hazard), and combinations of all of these.

6. Implement controls

Once controls have been identified for all hazards, the employer then needs to put them into place. This includes activities like training staff, providing PPE, and installing safety devices like guards, soundproofing, and ventilation.

7. Communicate hazards

Hazards must be communicated to all staff to make everyone aware of the hazards they face in their role and what controls are in place. The information gathered in the previous steps needs to be documented and available to everyone at any time and location.

8. Monitor controls for effectiveness

Controls need to be monitored after they are implemented so the employer can see if they are working and if any changes are needed. This step requires the employer to consciously monitor work from a health and safety perspective; it also requires the employer to respond to any health and safety concerns from staff.

9. Review and revise

Finally, employers need to review their formal hazard assessments on a regular basis and make any revisions and updates as needed. Employers should look at information from their company like site-specific hazard assessments and incident investigations as well as information from their industry like publicly-available incident reports.

Part 2 - How to Conduct Site-Specific Hazard Assessments

Site-specific, or field-level, hazard assessments are a tool available to employers to look for any unexpected and new hazards that may develop at a worksite. They do not replace formal hazard assessments; in fact, they are an administrative control that is part of a larger safety system meant to systematically look for hazards not identified in formal assessments.

Site-specific hazard assessments should be documented so they can serve as sources of hazard information when formal hazard assessments are being done and revised; however, it is important an employer devise a site-specific system that is manageable and not overly burdensome. It is not necessary for each individual person to complete a form to demonstrate these assessments are taking place, so an employer may find it is most effective to have a single person document any findings and corrective actions and have other workers participate verbally. Taking steps like this to reduce the amount of paperwork being produced can help alleviate worker stress and reduce the amount of documentation the employer needs to manage.

The following subsections outline a basic process for performing one of these assessments. [2]

1. Determine tasks for the day/shift

The first step of a site-specific hazard assessment is to identify what work tasks will be done at the worksite over the course of the next shift. This needs to be done at the start of the shift itself so current conditions can be considered. All workers should be welcomed to provide input.

2. Identify hazards

Once the tasks for the specific shift and worksite have been identified, identify the hazards present in each task the same way as would be done for a formal hazard assessment. Since this is being done at the worksite, the condition of the actual site can be examined. Again, all workers should provide input.

3. Eliminate or control hazards

Next, all identified hazards need to be eliminated or controlled, just like for a formal hazard assessment. The person leading this step needs to be competent to do so and have the authority to make any necessary changes to the work (or even cancel certain activities). All staff should provide input as appropriate.

4. Communicate hazards and controls

Once controls have been decided upon and there is a plan to move forward, this information needs to be communicated to all people present at the site. This may require involving other employers, a prime contractor, or members of the public who are near the site.

5. Repeat when change(s) occur

Finally, site-specific hazard assessments need to be repeated whenever the conditions at the worksite change. Examples of change include new equipment and people showing up on site, a significant change in the weather, and each change of shift.

Part 3 - Provincial versus Federal Hazard Assessment Legislation

All employers in Alberta must have a system for formal hazard assessment, regardless of if they are federally or provincially regulated. This section provides a direct comparison between the two sets of legislation [3].

Table 1 presents the general, high-level legislative requirements for employers to assess health and safety hazards in their operations. For provincially regulated employers, these general requirements are found in Alberta's Occupational Health and Safety Act ([SOA 2020 Ch. O-2.2](#)). For federally regulated employers, these general requirements are found in Part II of the Canada Labour Code ([RSC 1985 c. L-2](#)).

Table 2 presents the specific legislative requirements for an employer's hazard assessment system. For provincially regulated employers, these specific requirements are found in Alberta's Occupational Health and Safety Code (AR 191/2021).

T For federally regulated employers, these specific requirements are found in the Canada Occupational Health and Safety Regulations ([SOR/86-304](#)).

Note

These tables are only presenting legislation related to hazard assessment programs. There are many other legislated requirements to be met regarding addressing specific hazards. Employers must familiarise themselves and comply with all OHS legislation applicable to their operations.

Table 1 – General Hazard Assessment Requirements

Provincial (Alberta) Legislation
For provincially regulated employers in
Alberta Occupational Health and
Safety Act 2020, Chapter O-2.2

Section 3(4):

“Every employer shall keep readily available information related to work site hazards, controls, work practices and procedures and provide that information to

- (a) the joint health and safety committee, if there is one, or health and safety representative, if there is one, at the work site,
- (b) the workers, and
- (c) the prime contractor, if there is one.”

Section 4(b):

“advise every worker under the supervisor’s supervision of all known or reasonably foreseeable hazards to health and safety in the area where the worker is performing work”

Provincial (Alberta) Legislation
For provincially regulated employers in Alberta
Occupational Health and Safety Act
2020, Chapter O-2.2

Section 125(1)(s):

“ensure that each employee is made aware of every known or foreseeable health or safety hazard in the area where the employee works”

Section 125(1)(z.03):

“develop, implement and monitor, in consultation with the policy committee or, if there is no policy committee, with the work place committee or the health and safety representative, a prescribed program for the prevention of hazards in the work place appropriate to its size and the nature of the hazards in it that also provides for the education of employees in health and safety matters”

Section 125(1)(z.04):

“where the program referred to in paragraph (z.03) does not cover certain hazards unique to a work place, develop, implement and monitor, in consultation with the work place committee or the health and safety representative, a prescribed program for the prevention of those hazards that also provides for the education of employees in health and safety matters related to those hazards”

Section 125(1)(z.11):

“provide to the policy committee, if any, and to the work place committee or the health and safety representative, a copy of any report on hazards in the work place, including an assessment of those hazards”

Section 125(1)(z.14)

“take all reasonable care to ensure that all of the persons granted access to the work place, other than the employer’s employees, are informed of every known or foreseeable health or safety hazard to which they are likely to be exposed in the work place”

T For federally regulated employers, these specific requirements are found in the Canada Occupational Health and Safety Regulations ([SOR/86-304](#)).

Note

These tables are only presenting legislation related to hazard assessment programs. There are many other legislated requirements to be met regarding addressing specific hazards. Employers must familiarise themselves and comply with all OHS legislation applicable to their operations.

Table 2 – Specific Hazard Assessment Requirements

Provincial (Alberta) Legislation For provincially regulated employers in Alberta Occupational Health and Safety Code AR 191/2021	Federal Legislation For federally regulated employers in Alberta Canada Occupational Health and Safety Regulations SOR/86-304
<p>Part 2 Hazard Assessment, Elimination and Control:</p> <p>Hazard assessment</p> <p>7(1) An employer must assess a work site and identify existing and potential hazards before work begins at the work site or prior to the construction of a new work site.</p> <p>7(2) An employer must prepare a report of the results of a hazard assessment and the methods used to control or eliminate the hazards identified.</p> <p>7(3) An employer must ensure that the date on which the hazard assessment is prepared or revised is recorded on it.</p> <p>7(4) An employer must ensure that the hazard assessment is repeated</p> <p>(a) at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions,</p> <p>(b) when a new work process is introduced,</p> <p>(c) when a work process or operation changes, or</p> <p>(d) before the construction of significant additions or alterations to a work site.</p> <p>Worker participation</p> <p>8(1) An employer must involve affected workers in the hazard assessment and in the control or elimination of the hazards identified.</p>	<p>Part XIX Hazard Prevention Program</p> <p>Hazard Prevention Program</p> <p>19.1 (1) The employer shall, in consultation with and with the participation of the policy committee, or, if there is no policy committee, the work place committee or the health and safety representative, develop, implement and monitor a program for the prevention of hazards, including ergonomics-related hazards, in the work place that is appropriate to the size of the work place and the nature of the hazards and that includes the following components:</p> <p>(a) an implementation plan;</p> <p>(b) a hazard identification and assessment methodology;</p> <p>(c) hazard identification and assessment;</p> <p>(d) preventive measures;</p> <p>(e) employee training; and</p> <p>(f) a program evaluation.</p> <p>Implementation Plan</p> <p>19.2 (1) The employer shall</p> <p>(a) develop an implementation plan that specifies the time frame for each phase of the development and implementation of the prevention program;</p> <p>(b) monitor the progress of the implementation of the preventive measures; and</p> <p>(c) review the time frame of the implementation plan regularly and, as necessary, revise it.</p>

Table 2 – Specific Hazard Assessment Requirements continued

Provincial (Alberta) Legislation

For provincially regulated employers in Alberta
Occupational Health and Safety Code
AR 191/2021

Hazard elimination and control

9(1) If an existing or potential hazard to workers is identified during a hazard assessment, an employer must take measures in accordance with this section to

- (a) eliminate the hazard, or
- (b) if elimination is not reasonably practicable, control the hazard.

9(2) If reasonably practicable, an employer must eliminate or control a hazard through the use of engineering controls.

9(3) If a hazard cannot be eliminated or controlled under subsection (2), the employer must use administrative controls that control the hazard to a level as low as reasonably achievable.

9(4) If the hazard cannot be eliminated or controlled under subsection (2) or (3), the employer must ensure that the appropriate personal protective equipment is used by workers affected by the hazard.

9(5) If the hazard cannot be eliminated or controlled under subsection (2), (3) or (4), the employer may use a combination of engineering controls, administrative controls or personal protective equipment if there is a greater level of worker safety because a combination is used.

Emergency control of hazard

10(1) If emergency action is required to control or eliminate a hazard that is dangerous to the safety or health of workers,

- (a) only those workers competent in correcting the condition, and the minimum number necessary to correct the condition, may be exposed to the hazard, and
- (b) every reasonable effort must be made to control the hazard while the condition is being corrected.

Federal Legislation

For federally regulated employers in Alberta
Canada Occupational Health and Safety Regulations
SOR/86-304

Part XIX

Hazard Prevention Program

Hazard Prevention Program

19.1 (1) The employer shall, in consultation with and with the participation of the policy committee, or, if there is no policy committee, the work place committee or the health and safety representative, develop, implement and monitor a program for the prevention of hazards, including ergonomics-related hazards, in the work place that is appropriate to the size of the work place and the nature of the hazards and that includes the following components:

- (a) an implementation plan;
- (b) a hazard identification and assessment methodology;
- (c) hazard identification and assessment;
- (d) preventive measures;
- (e) employee training; and
- (f) a program evaluation.

Implementation Plan

19.2 (1) The employer shall

- (a) develop an implementation plan that specifies the time frame for each phase of the development and implementation of the prevention program;
- (b) monitor the progress of the implementation of the preventive measures; and
- (c) review the time frame of the implementation plan regularly and, as necessary, revise it.