

Ask an Expert

Question:

J. Steel, Safety Group Member

I've heard of the recent tragic accident in Toronto, where 4 workers fell to their deaths. We are a small manufacturer, and we think we're doing everything that's legally required, in terms of fall protection. However, to be sure, can you summarize what the requirements are and where exactly they're found in the OHS/Regulations?

Answer:

**Steven Johnson, CRSP, OHST, CET
President, Safety Training And Consulting Services Inc. (STACS)**

How one complies with the legal requirements is a tough one to answer with a short reply. Every situation is different and may involve technical nuances which are tough to address in a response such as this. Having said that, let's begin with the basics.

As I understand it, you're a small manufacturing company and as a result you're covered by the Industrial Establishments Regulation 851. This Regulation can be accessed quite easily via the Ministry of Labour's website; <http://www.labor.gov.on.ca/english/hs/laws/regulations.php>.

Here are the sections I would review initially:

S85 and S86: General Fall Protection Requirements
S14 and S15: Guardrails and Covers
S18 and S73: Portable and Fixed Ladders

Now the amount of detail found in these sections is minimal, consequently, I would access the **Construction Regulation 213** (even though you're not a construction company) as a resource. **Employers are always charged with the responsibility of "taking every precaution reasonable" in order to be duly diligent.** It's my opinion that the information found in these construction sections may assist you in becoming duly diligent and "flesh out" your fall protection program.

Here are the sections I would concern myself with:

S26: General Fall Protection Requirements
S78-84: Fixed and Portable Ladders
S148: Elevated Work Platforms (lifts)

These are great starting points but shouldn't be considered as exhaustive resources. There are also a whole slew of CSA standards that may require referencing.

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Answer: (continued from page 1)

It's also critical that your workforce be properly educated. So in short, fall protection gets complicated in a hurry. The "good old days" of simply supplying an employee with a harness and lanyard and telling them to "tie off" to an anchor point, can end in disaster. Educate yourself on the topic and ask questions.

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It's also critical that your workforce be properly educated. **Please refer to my article in this month's publication** and you'll be supplied with a tool which will allow you to gauge the level of comprehension that your employees currently possess.

So in short, fall protection gets complicated in a hurry. The "good old days" of simply supplying an employee with a harness and lanyard and telling them to "tie off" to an anchor point, can end in disaster. Educate yourself on the topic and ask questions.

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