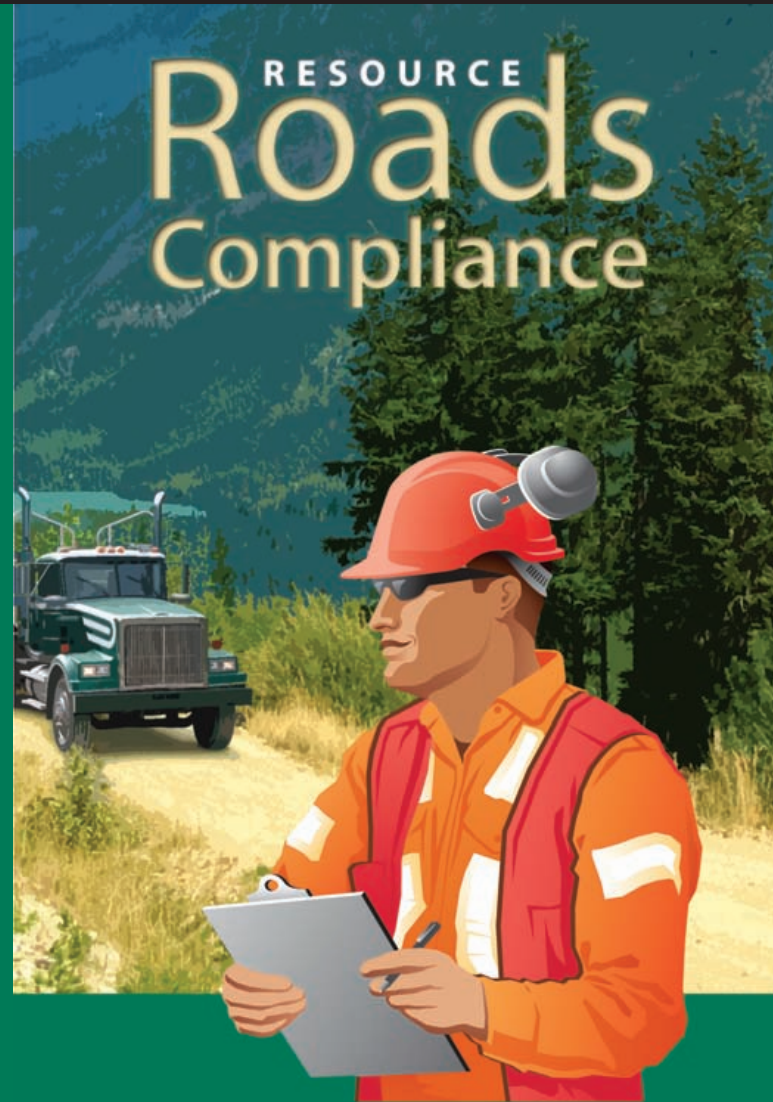


This Infoplip is for WorkSafeBC officers for use as a guide in their inspectional work. Interested stakeholders may refer to or use the information contained in this infoplip to assist them in carrying out their occupational health and safety roles and responsibilities. WorkSafeBC makes no representations, warranties, or, condition, expressed or implied, that this document is and will remain accurate at all times.

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This infoplip does not replace the Occupational Health and Safety Regulation or the Workers Compensation Act. This infoplip is not intended to explain the many health and safety requirements that apply to this industry. Employers and workers should always refer to the Act/Regulation and applicable guidelines for specific requirements that apply to their work operations and activities.



WorkSafeBC Safety Officer Inspection Protocol

Personal Protective Equipment (PPE) Protocol

The Officer must wear all PPE including:

- Safety headgear
- Protective eye wear/screen
- Hearing protection
- Hi-visibility apparel (vest)
- Gloves as needed
- Safety footwear/Caulk Boots
- Long sleeves & appropriate pants (denim preferred)
- Weather-related gear when appropriate (rain, snow, cold)

Accessing the Worksite Protocol

- Follow road protocol; no cell phone use while driving
- Use the appropriate communication procedures for traveling on resource roads (radio frequency)
- Drive to the posted speed limit or current conditions
- Park out of the way and identify self to the PC or contractor before proceeding
- Receive site orientation or obtain a guide for the visit
- Follow all the employers' safety rules, where these rules surpass WorkSafeBC's own internal safety program

Pre-Inspection Protocol

- Plan the inspection (Firm file check, EFS)
- Ensure site is active and obtain site orientation

Inspection Protocol

- Be professional and respectful
- Keep accurate/complete field notes (blue Officer notebook) including:
 - Location of worksite and number of workers on site
 - Names of person who accompanies you
 - Name of supervisors and workers (Union if applicable)
 - Equipment type(s), serial and model numbers
 - If necessary record statement of supervisor and workers
 - Take photographs and measurements as required
 - Collect any information that would serve as a memory tool

Post Inspection Protocol

- Complete inspection report
- If required and appropriate, visit firm's office to discuss issues requiring further attention
- Follow provincial/regional administration processes
- Carry out normal inspection follow-up

Note: As per operating procedure, routine inspections must not be pre-announced.

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REFERENCE



Reference documents provide supplementary materials and information that will assist in organizing and carrying out inspections and identifying stakeholder responsibilities

1 Overview

The purpose of this document is to provide field officers with information and guidance in assessing the occupational health and safety duties and obligations of all **stakeholders (6, 7)** involved in managing and using resource road systems. It may also be useful to managers and other individuals involved in road management and road use in industries such as forestry, oil and gas, mining, and other tenures.

This publication pertains to a variety of resource **road types (5)**, including forest service roads, branch roads, and on-site roads such as roads that travel through a cut-block or other work areas. It is intended to complement the document on Cut Block Obligations and Responsibilities and expands resource road use to all industries. It may be used alone or in conjunction with the more detailed and prescriptive Resource Roads Safety Practices (RRSP) document (often referred to as The Matrix), available online at worksafebc.com.



Scope

This document will explain:

- The types of resource road systems
- The types of stakeholders involved in resource road systems
- The roles and obligations of the stakeholders
- How to determine whether these duties and obligations are being met

Relevant Law and Policy

The relevant law and policy can be found in sections 115 to 119 of the Workers Compensation *WC Act* (the *WC Act*), various parts of the Occupational Health and Safety Regulation (the *OHS regulation*) referred to throughout this document, and related policy. All of these can be accessed on worksafebc.com.

Glossary

Abbreviations used in this document and terms such as **SRUP (15)**, knowledge and control commonly understood by field officers are further defined and/or explained in the glossary as they relate to resource roads.

Cross Referencing in this Document

This document will continuously refer to other sections, such as stakeholders which is highlighted in the same colour as the tab it is referring to. This will give the reader much more information to make informed decisions.

1 Overview

2 OHS Obligations

All **stakeholders (6, 7)** have obligations under the *WC Act* and the *OHS* regulation. This section summarizes in simplified terms the main obligations of the stakeholders. It does not include all relevant acts and regulations. For precise regulatory wording, the *WC Act* and the *OHS* regulation can be accessed at worksafebc.com.

An **owner (18, 19)**, under section 119 of the *WC Act* and section 3.10 of the *OHS* regulation, must:

- ✎ Provide and maintain the land and premises in a safe manner
- ✎ Pass on to the employer or PC at the workplace any knowledge they have of identified hazards and how to eliminate or control them
- ✎ Report any observed unsafe acts or conditions

The **PC (20, 21)** of an **MEWP (7)**, under section 118 of the *WC Act*, must:

Coordinate the occupational health and safety activities of employers, workers, and other persons at the workplace; and establish and maintain a system or process that will reasonably ensure compliance with the *WC Act* and the *OHS* Regulation

The **employer (25, 26)**, under section 115 of the *WC Act*, must ensure:

- ✎ Unsafe conditions are remedied
- ✎ Workers are made aware of foreseeable hazards and their rights and duties
- ✎ Safety policies and programs are established and followed
- ✎ Equipment, information, instruction, training, and supervision needed to ensure health and safety are provided
- ✎ Safety committees and or safety representatives are consulted and provided cooperation

Each employer of workers at an MEWP must give to the PC the name of the person the employer has designated to supervise the employer's workers at that workplace.

Every supervisor, under section 117 of the *WC Act*, must:

- ✎ Ensure the health and safety of all workers under their direct supervision
- ✎ Be knowledgeable about and comply with the *WC Act* and *OHS* regulations applicable to the work they supervise
- ✎ Ensure that known or reasonably foreseeable health or safety hazards in the area where they work are communicated to all workers under their supervision
- ✎ Consult and cooperate with the joint committee or worker health and safety representative and with Board officers

Every worker, under section 116 of the *WC Act*, must:

- ✎ Take reasonable care to protect their own health and safety and the health and safety of others who may be affected by their acts or omissions at work
- ✎ Comply with applicable acts and regulations
- ✎ Ensure they carry out their work in accordance with established safe work procedures
- ✎ Ensure that their ability to work without risk to their safety or that of another is not impaired by alcohol, drugs, or other causes
- ✎ Report to their supervisor or employer any unsafe acts or conditions
- ✎ Cooperate with the joint committee or worker health and safety representative and with Board officers

All persons have an obligation under 3.10 of the *OHS* regulation to take appropriate action and report any observed hazards or unsafe acts.

2 OHS Obligations

3 Knowledge and Control

The *WC Act* contemplates there could be more than one stakeholder at a work place that meets the definition of an owner.

When the **controlling owner (18, 19)** chooses to create a **PC (20, 21)**, there is an expectation that every owner, including tenure holders/licensees and other users of the road system, will keep information on hazards and risks current, in particular those that may be created by or known only to the them. This information must be communicated to the PC or owner (default PC).

Knowledge and control (**Glossary**) as they apply specifically to *OHS* for resource road management and use. This is the focus of the policy that supplements Part 3 Division 3 section 119 of the *WC Act*, both of which can be viewed at worksafebc.com

Considerations

Knowledge and information needed by the PC to fulfill regulatory obligations comes from:

- 📎 Owners and Individual licensees
- 📎 Employers
- 📎 Supervisors
- 📎 Workers
- 📎 Individual licensee and/or employer site **risk assessments (8)**
- 📎 Risk assessments in relation to the combined use of the road systems by the employers

Validation of Knowledge and Control

- 📎 Identify the various stakeholders on the road system that meet the definition of owner under the *WC Act* [see **FAQs (16)** on determining ownership and diligence]
- 📎 As per policy, determine which owner has the most control and knowledge with respect to health and safety considerations, and whether:
 - This controlling owner has assigned a PC or has assumed the duties of PC themselves
 - The PC is provided sufficient control and authority through written agreement
 - The communication systems between the PC, other owners and employers are effective
 - The PC has systems in place for coordination and compliance with respect to *OHS* obligations for road management and use
 - Other owners and employers have systems in place to disseminate the required information to related persons under their control and support the systems put in place by the PC

This information will assist the officer to determine the overall **chain of responsibility (14)** within the resource road system.

When sufficient knowledge and control are found to be in place, the officer can expect that the *OHS* obligations and related duties as outlined in the RRSP (**Glossary**) can be fulfilled.

Related Documents

- 📎 PC written agreement
- 📎 Related-meeting minutes at all levels
- 📎 Documented communications
- 📎 Posted alerts on signboards

3 Knowledge and Control

4 Road Design, Construction, and Maintenance

Introduction

User safety must be considered throughout the design, construction, and maintenance of roads.

Obligations

The **controlling owner (18, 19)** determines who is permitted to use the road system and for what purposes. The road must be safely designed, constructed, and maintained to standards appropriate for those users and their use. If road usage changes, design and construction may need to be revisited and upgrades made where necessary. Road users have an obligation to inform the contact person about unsafe road conditions to support the owner or **PC (20, 21)** in fulfilling their obligations.

Roads, Bridges, and Culverts

Road design and construction should address:

- ✎ Weather conditions in which the road will be used
- ✎ Intended use and service life of the road
- ✎ Road layout and junctions with existing roads
- ✎ Road width (turnouts and widenings)
- ✎ Appropriate travel speeds (which may vary throughout the system with terrain and road quality)
- ✎ Stopping and sight distances
- ✎ Maximum truck and trailer configurations



- ✎ Appropriate traffic control devices

Maintenance should address:

- ✎ Road prism maintenance including stabilization of the road cut and fill slopes, repair of minor scours and washouts, improvements of drainage systems before more serious problems occur, and removal of loose rocks
- ✎ Road surface maintenance
- ✎ Structural maintenance of the sub grade
- ✎ Clearing width and ditch and culvert maintenance
- ✎ Maintenance of bridges and structural inspections after severe storms and weather anomalies
- ✎ Routine inspections and regular maintenance for brushing
- ✎ Dangerous tree identification and maintenance

Sample Documents

- ✎ Design/construction plans
- ✎ Maintenance records
- ✎ Inspection records, which should include:
 - Date of the inspection
 - A condition assessment of the components of the structure
 - A recommendation for any needed repairs and a schedule for those repairs
 - The date of the next scheduled inspection
 - The length of time a bridge has been at its current site

5 Types of Roads

This flip describes more common types of roads and permits, but is not exhaustive. Permit systems are subject to change, but for the purposes of health and safety, ownership and other stakeholder's duties remain as stipulated in the *WC Act*.

Practice

A road permit allows a person to construct a road on Crown land, maintain an existing road or use a FSR. Permits include the location of the road to be constructed, used or maintained. Granted permits are not intended to adversely affect other authorized users of the road. Unless duties are clearly delineated and specified, a road permit does not necessarily give ownership or owner duties stipulated in the *WC Act* to the permit holder. It also does not create a **PC (20, 21)** for the road system.

Forest Service Road (FSR) (Mainline) includes roads constructed or maintained by the MFR/BCTS (**Glossary**) and roads declared under the Forest Act, such as conversion of a road permit. Government is to ensure maintenance until the road is de-activated. Rules of Use are described in the FSR Use Regulation (FSRUR).

Road Permit Road (RPR) (Branch Road) is a road built, used, and maintained by a licensee authorized under a road permit. These roads usually connect cut blocks and tie harvesting areas to FSR's, public highways, or log dumps, but may also include on-block roads built before a cutting permit is issued. Other industrial users may use these roads without any permit, provided they notify the permit holder and contribute a reasonable amount to the expense of maintaining the road.

Road Use Permit (RUP): All industrial users of an FSR must obtain an RUP from the District Manager, who may designate the holder to be responsible for carrying out all of the maintenance operations on the road. Only one RUP holder can be responsible at any one time for maintenance of a road section. The other RUP holders are required to notify the maintainer and contribute a reasonable amount to the expense of maintaining the road.

Special Use Permit Roads (SUP) are roads for which a permit is issued for construction and maintenance. These roads are normally restricted to mining operations outside a claim area, but other resource uses can be contemplated. Secondary industrial users may use these roads without any other permits.

Petroleum Development Road (PDR) issued through the Oil and Gas commission, it is a road constructed over Crown lands reserved for the construction and operation of a road, or operation of a road to facilitate exploration for, and the winning, extraction, and removal of petroleum and natural gas, and includes any extensions of such a road over land other than Crown land provided for in the application or subsequently authorized by the commission.

Highway (HWY) includes every highway within the meaning of the Transportation Act, every road, street, lane, or right of way designed or intended for or used by the general public for the passage of vehicles, and every private place or passageway to which the public, for the purpose of the parking or servicing of vehicles, has access or is invited, but does not include an industrial road.

Industrial Road (IR) (Branch Road) means a road on Crown land or private land primarily for the transportation by motor vehicles of (a) natural resources, whether raw, processed or manufactured, or (b) machinery, materials or personnel, and includes all bridges, wharves, log dumps, and works forming a part of the road.

Private Roads are roads on private land.

6 Stakeholders on Resource Roads

Owners: According to the *WC Act* several stakeholders involved in road use meet the definition of owner. The owners of land and premises being used as a workplace are required under the *WC Act* to provide and maintain them in a way that ensures the health and safety of everyone at or near the workplace. Therefore, an understanding of what is meant by the term owner with respect to resource roads is essential to understanding issues of **OHS obligation and compliance (2)**.

One owner can also be the default **PC (20, 21)**, depending on the owner's control or influence over the road and road use (see explanations of these stakeholder roles, below).

Controlling Owner: The owner of the defined workplace [referred to hereinafter as the **controlling owner (18, 19)**] is considered to be responsible for overall owner obligations for that workplace by default, in part because it is reasonable to expect that owner would have the most information about and most control concerning the road system.

In the case of resource roads, the majority of land is Crown land; so the Crown (and, for example, the Ministry of Forests and Range (MFR), as an administrative department of the Crown) is considered in most circumstances to be the controlling owner. For private lands the controlling owner holds the land title.

Second Owner: The controlling owner may choose to create a second owner for the purposes of *OHS* administration on a specified road system. In creating a second owner, the controlling owner delegates some *OHS* roles and obligations to the second owner. Before delegating *OHS* obligations, the controlling owner must ensure that the second owner has or is given sufficient information and control to fulfill those obligations.

The second owner then has the same performance obligations as defined under section 119 of the *WC Act* and it is important to note that all owners including controlling owners retain some of the obligations of 119 of the *WC Act*, Application of obligations is primarily driven by circumstances and reporting relationships. For example, a licensee would act as an owner and provide required information and direction to employers or contractors under their direct control.

Other Owners: Any licensee or tenure holder who occupies lands or premises used as a workplace is considered to be an owner with respect to *OHS* obligations. Licenses, permits, and tenure agreements can be awarded for timber rights and other activities such as road use, hunting, guiding, grazing, water use, and energy and mineral exploration. The duties and work place control of the licensee or tenure holders may be limited by the terms of their agreement with the Crown, so their workplace safety obligations have to be considered on a case-by-case basis. See **OHS obligations (2)**.

Prime Contractors (PC): A PC can only be created by the responsible owner (controlling owner or second owner) and is only required in an MEWP (see next heading). PCs in MEWPs are responsible for ensuring that *OHS* activities of employers, workers, and other persons at the workplace are coordinated, and doing everything reasonably practicable to establish and maintain a system or process that will ensure compliance with the *OHS* regulation. On the road system this obligation requires some control of use and application of an **SRUP (15)**.

The controlling owner (or created secondary owner) is considered to be the PC by default if that role has not been delegated in a written agreement to someone else, such as a directing contractor, employer, or other person.

6 Stakeholders on Resource Roads

7 Stakeholders on Resource Roads

Multiple Employer Workplace (MEWP)

An MEWP is created when workers of two or more employers are permitted or allowed to utilize the same road system. In such situations the duties of a PC must be fulfilled and all owners are responsible for fulfilling and/or supporting the duties set out in section 119 of the *WC Act*, the *OHS* regulation, and any applicable orders, with some limitations (see section 124 of the *WC Act*).

An owner (who is the default PC) has options regarding management of their obligations. The owner may transfer control over certain *OHS* responsibilities such as maintaining roads or monitoring road use, but retains control over responsibilities such as coordinating other employers/owners or managing road use. To manage a road use system requires good documentation and administration, recognizing that obligations may be delegated but the responsibility to ensure they are fulfilled may remain with the owner.



See management options below.

Employers: Employers are directly responsible to an owner such as a licensee, and should receive much of their information on road systems from that owner. However, all employers on road systems have performance-based ***OHS obligations (2)*** as outlined in section 115 of the *WC Act*. As they take on other roles, their obligations under section 115 may change to meet the requirements of the assumed role. Some traditional roles and unique circumstances for employers are outlined.

Employers who transport workers (27): Most employers on a road system transport workers to and from worksites or require workers to transport themselves. These employers have unique responsibilities.

Employers as occasional users (28): Some employers provide services or carry out duties for other industries that require their own workers to travel on resource roads (for example, service trucks, delivery vans, and independent consultants). These unique employers may not have the systems in place for the required information flow, in these cases the required information and procedures must be provided to them by other responsible stakeholders.

Employers with equipment on the road (29): Most employers will, on occasion, have additional equipment such as loaders or low beds working or traveling on the road system. Safe road travel must be considered when planning these occasions.

Workers and Drivers (30, 31): Workers include all employees of an employer. Workers and drivers are end users of all systems put in place for road safety. They are obligated to follow/support systems put in place by other stakeholders, and to fulfill the obligations in 116 of the *WC Act*.

Management Options for Owners

Owners have a number of options available to them for fulfilling their duties and obligations with respect to *OHS*.

Prime Contractor (20, 21): An owner with control can create a PC. The obligations of the PC under section 118 of the *WC Act* are the same regardless of whether an owner creates a PC or retains those duties. To create a PC a written agreement outlining the duties of the PC must be in place. According to policy there can only be one PC on a defined road system.

Maintenance Contractor (22): The owner may delegate maintenance duties to one or more contractors on road systems. The owner is still responsible for ensuring the roads and areas are maintained to a safe standard.

Road Safety Management Group (RSMG 32) (or RUG): Although it may not be their primary function or obligation, RSGMs are a tool which may be used to assist in management of *OHS* responsibilities on resource roads.

7 Stakeholders on Resource Roads

8 Risk Assessment Considerations

Obligations

A risk assessment must be performed to determine the nature and extent of the risks and hazards in the workplace (in this case, the road system). Assessments must be done on a regular basis of all equipment, machinery, work methods and practices in use on the road system, to prevent the development of unsafe working conditions. Risk assessments must be done on a frequency as dictated by the changing in conditions or anticipated use of the road systems.

Individuals must also undertake personal risk assessments to consider their experience, knowledge, and capabilities to safely operate on the specific road systems.

Practice

Hazards are defined as a source of potential danger – either a condition or work practice – that poses a risk to health and safety. The considerations for resource roads are separated into four categories (the Road, Load, Truck, and Driver) to help identify potential hazards.

Stakeholders and Equipment

Several different **stakeholders (6, 7)** may have responsibility for performing risk assessments. Owners, second owners, and employers are responsible for performing assessments. When there is an **MEWP (7)**, the PC is also required to perform assessments for all workers in the workplace.

Considerations

The Road: Road design, users, amount of traffic, sight lines (visibility), road widths, pullouts, steepness of grades, road coefficients, signage, safety coordination, radio frequencies, traffic control, road maintenance, dust control, dangerous trees, snow plowing, riparian zones, routine inspections, post-event inspections



The Load: Truck configuration, off-highway, on-highway, binders, length, weight, and height



The Truck: Capacity, configuration, brake condition, tires, power train, radio equipment, emergency equipment, daily inspection, proper maintenance, truck log book



The Driver: Licensing, experience, local knowledge, cycle times, driver logbook, PPE (**Glossary**), attitude, substance abuse policy, personal safety plan



Emergency plans: Avalanche, landslide, rainfall shutdown criteria, earthquakes, floods, hazardous spills, fires, emergency evacuation, blocked access, any barriers to first aid being provided to an injured worker

SCENARIOS AND TOOLS

B



Sample scenarios mimic real situations found on resource roads, which increase in complexity. Determination of stakeholders, workplaces, and management tools are summarized.

9 Determining the Workplace

This section relates to officers' fieldwork and the way in which they determine the scope of their inspection or investigation with respect to the borders of the workplace.

Obligations

Under their mandate, officers visit workplaces and determine whether conditions and practices are acceptable with respect to the *WC Act*, *OHS* regulations, and related standards. They identify concerns and determine which of the **stakeholders (6, 7)** are responsible for taking corrective action.

Practice

Officers' fieldwork as it applies to roads is carried out using the same protocols as other field visits where possible. In the course of using resource roads for travel, officers observe road signage, physical aspects of the road, and road use, and ensure radio protocols are followed. Most inspections focus on a specific section of road, an observed issue, a reported circumstance, or an incident requiring investigation.

Stakeholders and Equipment

The complexity of road systems and interlinking responsibilities of individual stakeholders are covered in separate flips. To apply the *WC Act* and *OHS* Regulation, officers must define the boundaries of their inspection report (for example, the section of road, or the road title to which it pertains) and identify each stakeholder who has not fulfilled their specific obligations. For example, people and equipment that are creating a hazard may be the direct responsibility of an **employer (24, 25)**. In addition, the officer should look to the appropriate level in the **responsibility chain (14)** and determine if coordination of unrelated parties is also an issue. The end user or worker's obligations should always be considered at the workplace.

Considerations

Inspection Boundaries (workplace as defined by an officer)

Inspection boundaries do not have to encompass the entire workplace as defined by the owner. Standard protocols should be followed in determining the scope of the inspection report, appropriate actions are to be taken during the inspection, along with a plan for follow-up.

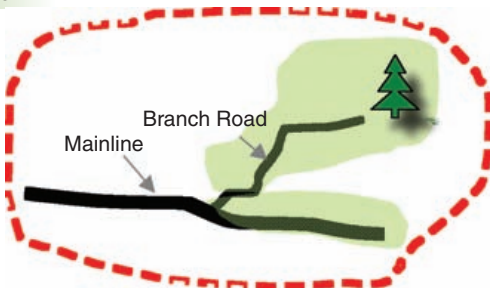
In organizing the inspection, officers should:

- ✎ Consider the make up of the road system, such as private land, public highways, forest roads, regulated **resource roads (5)**
- ✎ Determine if this road is an **MEWP (7)**
- ✎ Identify which owner would be considered the default **PC (20, 21)** for that defined area of road
- ✎ Limit the scope of the inspection to an area that would be under the responsibility of one PC or one owner (who is default PC)

10 Ownership and Control Scenarios

The following scenarios represent a small sample of ownership and control situations found on resource roads. The scenarios increase in complexity from #1 to #4. These samples can be used as a tool to help understand and explain the **chain of responsibility (14)**. See **types of roads (5)** for explanations.

Scenario #1



This is a basic scenario with only one other owner using these roads on a regular basis.

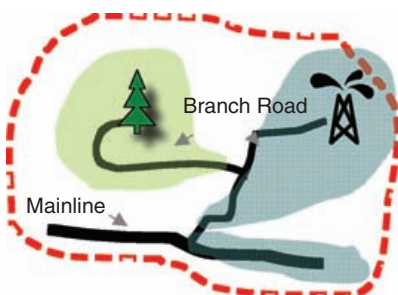
This owner can be afforded control for *OHS* obligations, as other users are likely only occasional users or public. In reality, there may be several employers utilizing the road system but each of these employers would be directly related to the **second owner (6)**. Most occasional users such as service vehicles would be related to employers under sufficient control of the “second owner.”

The **SRUP (15)** would have provisions to communicate issues and reasonably assure safe use of all users.

For the mainline this scenario also presumes a single owner.

All **stakeholders (6, 7)** should utilize applicable sections of the RRSP (**Glossary**).

Scenario #2



In addition to the **controlling owner (18)** depicted by the red outline, there are 3 different mixes of owner circumstances in the road system.

The **(green)** second owner and the **(blue)** second owner from the worksite to the Y in the branch road are owners with knowledge & control. From the Y to the mainline is a known mix of the two owners.

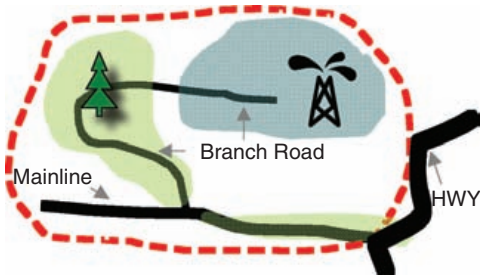
A second owner must be given sufficient control by the controlling owner or the controlling owner maintains the obligations for *OHS* coordination.

Control on the mainline would also depend who is given sufficient control for *OHS* purposes.

10 Ownership and Control Scenarios

11 Ownership and Control Scenarios

Scenario #3

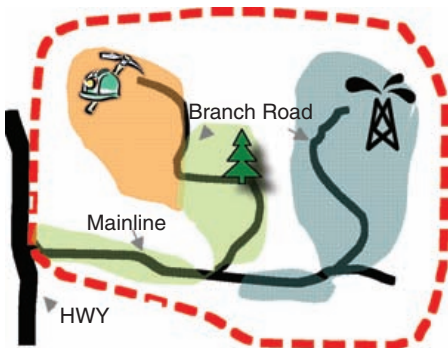


This scenario differs from Scenario 2 in that the (blue) second owner travels through an active work area.

Sufficient control for *OHS* purposes in that area must lie with the (green) second owner.

A decision must be made on the section of road from the cut block or work area to the mainline, over which owner/employer is best suited to be given sufficient control or the controlling owner (18) (red) will retain all owner *OHS* obligations (2) including being the default PC (20, 21).

Scenario #4














This scenario depicts 5 distinct owner circumstances or mixes on the road systems. In the case of the blue owner and the orange owner, these are single owner branch roads.

The (green) owner through the cut block or work area must have control for *OHS*. From the (green) owner cut block to the mainline there is a mix of (green) and (orange) owner traffic. The controlling owner (red) can make a decision to give sufficient control to one owner or retain control and fulfill *OHS* obligations.

The mainline appears to have two separate owner circumstances and an owner given most control may be identifiable for *OHS* purposes.

Scenario Key

-   Crown or Ministry/Controlling Owner
-   Forestry Licensee/tenure and/or Second owner
-   Oil & Gas Licensee/tenure and/or Secondary Owner
-   Mining Licensee/tenure and/or Secondary Owner
-  A Mainline, most likely a FSR
-  B Branch Road, most likely RPR or PDR
-  C HWY, main public highway

12 Coordination and Compliance for MEWP

Each **stakeholder (6, 7)** has a role in the *OHS* coordination process and must comply with the *WC Act* and *OHS* regulation. Responsibilities for coordination and compliance are cascading and cumulative [see **Chain of Responsibility (14)**], and are essential to a safe road use system [see **SRUPs (15)**].

General Considerations

- ✎ The **PC (20,21)** or default PC has the most obvious **OHS obligation (2)** for coordination under the *WC Act*. However, consideration of who is responsible for coordination in any given situation should not be limited to the PC because coordination and compliance apply to all stakeholders
- ✎ In determining responsibilities, an essential step is to determine whether the stakeholders are related or unrelated (from a business relationship and responsibility perspective). Some relationships may be quite complex
- ✎ All *OHS* coordination and compliance responsibilities must be managed in a way that takes into consideration the safety of both related and unrelated users. Each level of related stakeholders must coordinate safe road use for the stakeholders directly below them in the responsibility chain and look to the stakeholder above them for guidance and a plan for overall safe use coordination. This includes persons or stakeholders they cause or permit to be on the road system

Coordination

The coordination of road management and road use necessary for safe use of the road requires:

- ✎ An owner (default PC) who ensures there is a system in place to coordinate the safe use of the road between the various users; this owner may assign a PC to carry out the requirement
- ✎ Knowledge of who the stakeholders are in terms of *OHS* obligations and road use; for example, on any resource road system there may be levels of owners, related employers, contractors, sub-contractors, and occasional users including MFR (**Glossary**) staff, WorkSafeBC officers, and service providers as well as the public
- ✎ An SRUP based on known factors such as **road design and construction, maintenance (4)**, volumes, user characteristics, and other conditions (for further details please and visit worksafebc.com to view the RRSP Matrix in **Glossary**)
- ✎ A process whereby the PC can coordinate safe use through the responsible licensee or other owner when it is not feasible for the PC to have direct contact with employers hired by and responsible to a licensee or other owner
- ✎ A monitoring system to identify circumstances and issues that may create a hazard for any user, and a process to investigate issues and circumstances to determine when corrective measures are required and to take appropriate action



13 Coordination and Compliance for MEWP

Compliance

Responsibilities for compliance vary for each **stakeholder (6, 7)**. For example, if a trucker is speeding and is related to an **employer (24, 25)** who in turn is related to a licensee/second owner then the communication on the issue may be from the **PC (20,21)** to the licensee and in turn from the licensee to the employer, then to the worker. Therefore, when assessing responsibility for a violation the officer should evaluate what information each workplace stakeholder was afforded and what was their **OHS obligation (2)** to ensure it reached the user. The inspection/investigation should look beyond the obligations of one individual workplace stakeholder and review the planning, training, and supervision that each stakeholder should have in place that would have supported compliance.



Considerations

- ✎ The PC structures an **SRUP (15)** with consideration to all variables
- ✎ Each stakeholder knows they are responsible for compliance under the *WC Act* and *OHS* regulation, and for compliance with the SRUP for the specific road system
- ✎ The PC's system should include risk assessments carried out on a regular basis to ensure all hazards are identified, information is provided to all stakeholders on the hazards, and the SRUP is current and functional
- ✎ Each owner (or employer that is not related to an owner), carries out risk assessments to ensure the persons responsible to themselves can and are operating safely
- ✎ The PC should ensure all information provided to the users is current and supports the SRUP
- ✎ Each workplace stakeholder has a segment in their safety program that addresses safety issues under their control
- ✎ Each owner (or employer that is not related to an owner) has a system to monitor safe use by persons under their control
- ✎ Each employer is responsible for supervision of their workers

Sample Documentation

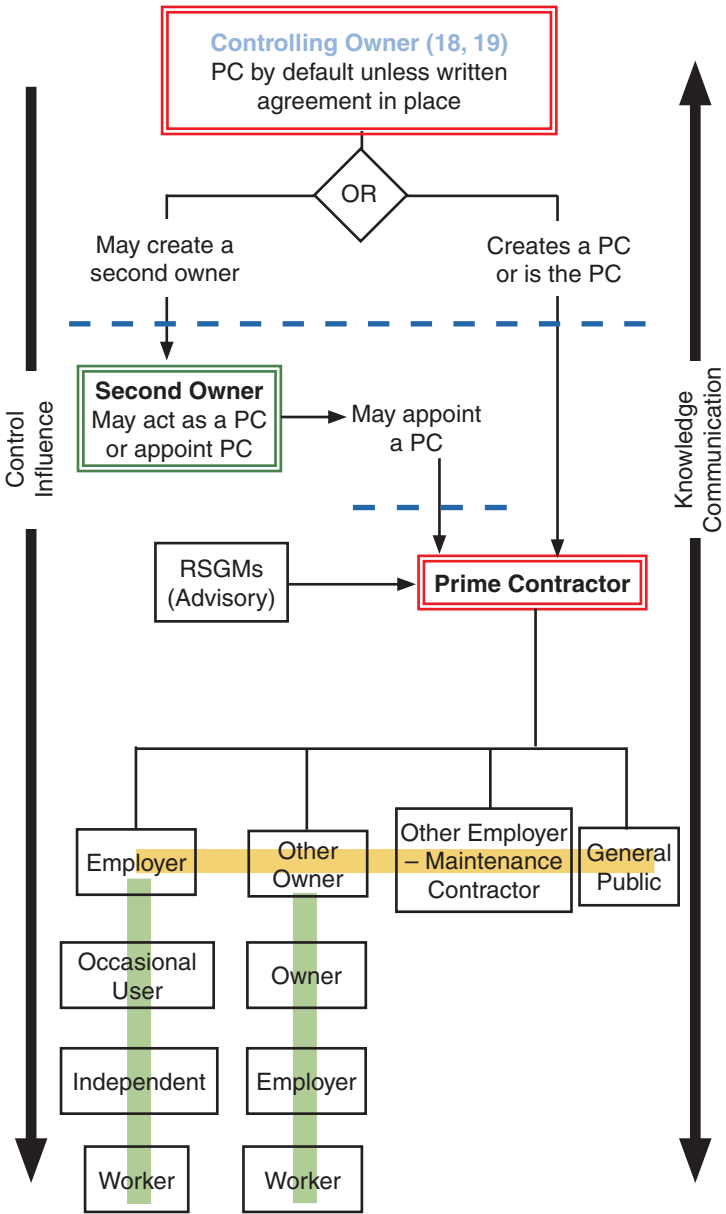
- ✎ SRUP
- ✎ Other owners' programs to deal with their own safe road use
- ✎ Regular updates, list of users, and confirmation of volume from related owners
- ✎ **RSMG (32)** terms of reference if applicable
- ✎ PC agreement if applicable
- ✎ Risk assessment documents
- ✎ List of known and communicated hazards
- ✎ Related meeting minutes

Validation of Overall Coordination and Compliance

- ✎ Review of documentation each stakeholder's safe use program
- ✎ Review of PC's systems for coordination and compliance
- ✎ Discussions with users
- ✎ Observation of road use by various users
- ✎ Review of each stakeholder's safe use program

14 Chain of Responsibility

The following chart depicts the cascading responsibilities and the fact that each stakeholder (6, 7) has OHS obligations (2) regardless of whether other stakeholders fulfill their own obligations. The controlling owner passes on the OHS responsibility for 118 of the WC Act to only one second owner or a PC (20, 21) on a specific road system. Knowledge and communication flow up and down the chain, while control or influence is passed down.



When the controlling owner creates a PC or provides a second owner with sufficient information and control, the controlling owner creates a Buffer of Responsibility for the purposes of 118 of the WC Act by creating a PC. All owners retain the obligations of 119 of the WC Act.

The PC primarily affects coordination and compliance through the work place stakeholder directly below them in the responsibility chain.

Other owners or employers are the communication link to all groups directly below or above them. They support coordination by ensuring compliance of the groups directly related to them.

15 Safe Road Use Plan (SRUP)

An SRUP is a tool that must be developed to support user safety. It is a means of providing coordination and some diligence by the owner or **PC (20, 21)**. An SRUP may be created by the owner (default PC), **RSMG (32)**, PC, or other; but the PC must ensure a plan for coordination and compliance for road use is in place.

Practice

An SRUP should be developed using information and feedback provided by the owner, PC, employers, and road users as well as a **risk assessments (8)**.

Considerations for an SRUP

- ✎ Who has access to the road system and who are the potential users of the road system
- ✎ Types of anticipated vehicles/equipment or vehicles/equipment used
- ✎ The **design/construction of the road (4)** allows for planned use
- ✎ Permit or no permit needed
- ✎ Other factors:
 - Seasonal issues
 - The effect of climate on roads
 - Service life of the road
 - Resource impacts
 - Economic factors
- ✎ Identification of the PC
- ✎ Identification of inherent hazards such as steep grades
- ✎ Radio frequencies and protocols
- ✎ Traffic control systems
- ✎ Volume and traffic patterns



Appropriate Travel Speeds

Travel speeds would be identified in the SRUP and posted on signage where appropriate. For general information about appropriate travel speeds, see the Forest Service Road Use Regulation (FSRUR), which can be accessed at www.for.gov.bc.ca.

Road Maintenance and Inspections

Communication

- ✎ Signage
- ✎ User orientations
- ✎ User group meetings
- ✎ Chain of command
- ✎ Information and Contacts
- ✎ Local papers
- ✎ BCFSC (**Glossary**) website and newsletters



Sample Documents

- ✎ Documented SRUP
- ✎ Radio use protocols

Validation

- ✎ Verify that known hazards are identified
- ✎ Verify that a road maintenance and use system is in place

For more information on SRUPs, see **Risk Assessment (8) and **Road Design, Construction, and Maintenance (4)****

16 FAQs for Officers on Resources Roads

This section provides information to form possible questions an officer may ask to determine ownership and *OHS* roles on resource roads, and whether diligence has been met by **stakeholders (6, 7)**. The wide variation in possible scenarios necessitates general rather than specific questions about ownership and identifying the **PC (20, 21)** or default PC. See the **scenarios (10, 11)** for further assistance.

Officers need to determine which stakeholders will be using or have influence on the road system and their relationships with each other and other stakeholders.

Sample information from owners/licensees/tenure holders and PC could include:

- Is this private or public land
- The boundaries of this workplace for the purposes of *OHS* management are
- Is there an **RSMG (32)** being used for this road system
- Has the controlling owner created a second owner with **K&C (3)**
- Is this an **MEWP (7)**
- Are there unrelated employers using this road system
- Who coordinates *OHS* and ensures a compliance system
- Is there an **SRUP (15)** applicable to this specific road system
- Is there a PC identified (is there a written PC agreement)
- How are hazards both known or created identified and communicated to users
- How is maintenance identified and who carries out the maintenance
- Are regular inspections and risk assessments carried out
- How are road incidents reported and investigations completed
- What is the system for users to report hazards
- What is the emergency response plan for this road system
- What documentation is kept on road management and use

Sample information from employers (24, 25) could include:

- Do your trucks or workers travel in any areas outside of this defined road system
- Who is your contact person that deals with the owner or PC
- Is there an SRUP in place and is it enforced
- Have you communicated the SRUP to all your workers
- Is coordination for traffic and safe use effective
- Have road and area hazards been identified to you
- What information do you provide to other employers such as service people that you require to travel on these roads
- What risk assessments have you carried out for roads traveled
- How do you monitor/supervise your workers use of the road systems
- How do you ensure incidents, hazards/concerns are reported
- What is your emergency preparedness and response plan
- What safe road use documentation is kept

Sample information from drivers/operators/workers (30, 31) could include:

- Are you aware of the SRUP for the road system
- Do you have the required licensing and certifications
- What training and experience have you had specific to driving on resource roads
- Is your vehicle and load appropriate for this road system
- Are you comfortable navigating the road systems
- Are you aware of your ***OHS* rights and responsibilities (2)**
- Are the road radio protocols followed at all times
- How and who do you report near misses or concerns to
- Are you included in investigations of incidents or near misses
- How do you get information on current road and maintenance
- Is feedback on supervision/monitoring given by the PC or employer
- Do you get sufficient and timely information from your employer
- What is the emergency response plan
- Are your log books kept current

These questions are a sampling and are not exhaustive, and the RRSP (**Glossary**) has specific sections for each stakeholder.

MANAGEMENT AND USE OF ROADS



All stakeholders who have the knowledge and/or control to affect usage have OHS responsibilities to ensure there is an effective system for safe road use and coordination.

17 Road Usage

General Practice

Unrelated users and the potential for unplanned or unexpected road usage complicates road system management. Therefore, before reviewing any road use management system, the workplace boundaries must be defined. This may be done by identifying road names and intersections or by other clear delineation. The owner with the most control should make decisions on workplace boundaries for *OHS* purposes. See sample **scenarios (10, 11)** that may assist in determining who has control.

Although an **RSMG (32)** may be in place to assist in the administration of the duties in fulfillment of the owner's obligations, there are *OHS* responsibilities that remain with the owner(s).

People and Equipment

In general terms, the owner [default **PC (20, 21)**] must have a system in place to ensure they are aware of industrial as well as potential public use of the road systems under their control/influence. The system would include information on use, characteristics of stakeholders such as hauling product or equipment.

General Considerations

The following is a general framework. More detail is provided in the reference section and on the individual stakeholder's flips for concepts such as **knowledge and control (3)**.

Providing a Safe Workplace

The owner must provide a safe workplace in terms of **road design and construction (4)**, and communicate to all stakeholders road limitations and any road hazards as required.

Maintenance

The owner must maintain or arrange for the roads to be maintained to appropriate safety standards.

Knowledge

A system must be in place to:

- Identify inherent hazards such as steep slopes or created hazards such as other users (for more information, see the RRSP in **Glossary**)
- Provide information on hazards to other owners such as licensees or individual employers not related to a defined owner
- Make general information on hazards and mitigation of hazards available through signage or other effective methods for all users including public

Control

The concept of control should apply to all the resource roads inside the boundaries of a defined workplace.

- The owner must apply control or influence for safety purposes on all persons and workplace stakeholders using the road system. Control may take the form of setting and enforcing road use limitations, defining and communicating an **SRUP (15)**, and ensuring road use standards are met
- In the case of **MEWPs (7)**, the controlling owner, second owner, or assigned PC will manage the coordination and have in place a system to reasonably ensure compliance by stakeholders. This may be facilitated through an RSGM, or managed through other methods

Coordination

The PC must ensure there is a system in place to coordinate the safe use of the road for all users, including all levels of owners, related employers, contractors, sub-contractors, and occasional users including MFR staff, WorkSafeBC officers, and service providers as well as the public.

Compliance

Each stakeholder has responsibilities for compliance.

- The PC must structure an SRUP with consideration to all variables
- Each stakeholder must be aware that they are responsible for compliance under the *WC Act* and *OHS* regulation and SRUP
- The PC must have a monitoring system in place and ensure that corrective action is taken
- Each owner (or employer unrelated to an owner) must have a system in place to monitor the safe use by individuals under their control
- Each employer is responsible for supervision of their workers

General Documentation

- SRUP
- Other employers programs to deal with their safe road use
- List of users and confirmation of volume from related owners
- RSMG terms of reference
- PC agreement if applicable
- Risk assessment (8)** documents
- List of known and communicated hazards
- Related meeting minutes

18 Controlling Owner

This section pertains to the controlling owner who also could be the default **PC (20, 21)**.

Obligations

Under section 119 of the *WC Act* an owner has responsibilities to provide and maintain the land and premises in a safe condition and communicate information about hazards to all **stakeholders (6, 7)**. In applying this to resource roads, land and premises would include the road, all related structures such as culverts and bridges, and the areas adjacent to the roads that may influence road safety.



Practice

Traditional owners who have influence over the management and use of resource roads include private landowners, MFR, BC Timber Sales, Ministry of Energy, Mines and Petroleum Resources, licensees, and other tenure holders. In many cases there is a ministry that can be termed the controlling owner, and it is by permission of this stakeholder that other owners and employers are permitted or allowed to use the road system. As per policy related to Part 3 Division 3, Sections 115 to 124 of the *WC Act*, this controlling owner is likely the owner with the most control and knowledge of the road and its use. This makes them the default PC where applicable.

Stakeholders, People, and Equipment

When considering road use management the officer must respect the complexity and diversity of the stakeholders and their use of the road. Use of the road by unrelated stakeholders without common work goals complicates planning for safe road use management. These complications are further compounded by the use of the road for travel and for carrying out other work such as drilling or logging.

Considerations

Road use and management system owners must:

- ✎ Provide or require adequate **road design, construction and maintenance (4)** to an acceptable standard that will support safe use
- ✎ Ensure road limitations are clearly communicated to stakeholders
- ✎ Ensure other users such as licensees and other employers or users are provided with information about any hazards known or should be known to the controlling owner. Information should include physical hazards as well as those created by the use of the road system by others. This is an ongoing obligation, as circumstances can change on road systems
- ✎ Assign a PC or take on the duties of the PC when the road system becomes an **MEWP (7)**
- ✎ A system to ensure the PC meets the duties outlined in the written PC agreement and the obligations of 118 of the *WC Act*

19 Controlling Owner

Information and Support for Road Users

Owners, through appropriate reporting and communication methods, ensure:

- ✎ All required information is provided to stakeholders that will enable them to make appropriate decisions on equipment and its anticipated use of roads
- ✎ All stakeholders are aware of road limitations with respect to trucks, vehicles, and loads in general and as conditions change
- ✎ A reporting and investigation system for road management and use
- ✎ A system that maintains current information and is available to users
- ✎ Support is provided to the employer in their efforts to contribute to **SRUP (15)**; this may be by means of providing information not readily available to the employer
- ✎ All observed road use issues are reported to the appropriate owner or employer
- ✎ There is a reporting and feedback system for all stakeholders using the road that will identify issues regardless of responsibility

Sample Documents

- ✎ Document identifying known hazards
- ✎ Minutes of meetings with Owners
- ✎ SRUP
- ✎ PC Agreement (if applicable)
- ✎ Documents on road design and limitations

Validation

- ✎ Verify that known hazards are identified
- ✎ Verify that a road maintenance and use system is in place
- ✎ Ensure road limitations are known to users

20 Prime Contractor (PC)

Information in this section assumes the road system under discussion is an **MEWP (7)** and a PC has been properly assigned. There is a written agreement and the PC has the capacity, knowledge and control to fulfill the function. However, if a PC is not put in place for an MEWP, the obligations do not change; they are simply undertaken by the **controlling owner (18, 19)** or the properly created **second owner (6)**.

Obligations

The obligations of a PC are outlined in section 118 of the *WC Act*. The functions of coordination and systems for ensuring compliance on road systems may vary depending on circumstances but must be well planned and effective to facilitate safe use. See **OHS obligations (2)**.

Practice

The PC must ensure that the *OHS* of all **stakeholders (6, 7)** is considered, planned for and administered. To fulfill the obligation of due diligence, the owner must continue to support the PC, because information known to the owner is subject to change. As well, the owner must have a system in place to ensure the PC continues to meet the duties outlined in their written agreement. Having an effective system ensures the PC has what is needed to put in place and monitor an **SRUP (15)**. This ensures accountability of the PC for meeting obligations under section 118 of the *WC Act*.

Stakeholders, People, and Equipment

Having diverse stakeholders and usage on resource road systems has implications for *OHS* coordination. The PC needs to put safety systems in place both for stakeholders they have control over and

for people with whom they do not have a direct working relationship. They may have to rely on information provided from several sources, including owners, employers, the public, monitoring systems, and their own risk assessments. Current information from these sources, including specifics about equipment on the road, will enable facilitation of an SRUP.

Considerations

PCs must have systems in place for coordination and compliance on the roads under their control. The outcome of these systems is awareness and communication of road limitations, safe use criteria, and an SRUP specific to the circumstances of the road system.

Coordination and compliance systems (12, 13) are discussed and are applicable to PCs.

PCs ensure an SRUP is documented and in place for rules of the roads, and is communicated to all users. The SRUP is based on cumulative needs and involvement of all users.

20 Prime Contractor (PC)

21 Prime Contractor (PC)

In carrying out their duties PCs should consider:

- ✎ Structured, planned communication to users concerning the essential elements of safe use, including communication such as signage and bulletins on information boards, discussions and appropriate written communication with other owners and users, and special communication venues such as user meetings
- ✎ Information communicated to users including all known and created hazards. Known hazards include use limitations created by **design, construction, maintenance (4)**, traffic flow, loads, and truck configurations. Created hazards could include other licensee/tenure holders and road-side work
- ✎ Confirmation that the road system in question is in a safe and usable condition. This would include confirming that road and design standards will safely support intended and added usage
- ✎ Identification and application of road maintenance standards, needs to be supported through the assigning owner
- ✎ A system to ensure roads are inspected regularly and hazards are addressed. This would include inspection of usage, with a monitoring and feedback system to ensure issues are communicated to the appropriate stakeholders and resolved
- ✎ Every effort on the part of travelling staff to observe any new or created hazards. A timely reporting system must be in place
- ✎ Provision for disseminating appropriate information to the public
- ✎ Provision for all stakeholders and individuals to report road issues and concerns. These issues and concerns are investigated, corrective measures taken, and feedback provided to the appropriate persons
- ✎ Provision for all accidents/incidents to be reported and analyzed to identify causes and necessary changes to system or use
- ✎ A good example set by PC and associated personnel when using the road system
- ✎ A system to ensure an Emergency Response Program (ERP) is in place and users are aware of its function

Sample Documentation

- ✎ SRUP, notes, and related documents
- ✎ **Risk assessment (8)** checklists or guidance given for inspections
- ✎ Records of minutes of meetings

Validation

- ✎ Review **SRUP (15)** for safety issues and documentation indicating mitigation of known hazards
- ✎ Review the SRUP for completeness
- ✎ Review any hazard reporting documents

21 Prime Contractor (PC)

22 Maintenance Contractor (MC)

Under Section 119 of the *WC Act*, the owner of a specific workplace (in this case, the lands in use for a road system) is responsible for ensuring that the workplace is maintained to a safe standard. Although maintenance is a function that an owner can delegate, it remains an owner's responsibility to reasonably ensure it is carried out. This does not relieve the maintenance contractor of their obligations. An MC may be an employer who, under Section 115 of the *WC Act*, has direct responsibility for ensuring that their actions, or lack of action, does not put any person at increased risk at or near the workplace. This obligates the MC to provide road maintenance to a safe standard and/or inform all affected persons of any hazards and risks.

Practice

An MC is responsible to the owner or **PC (20, 21)**. Systems put in place by these **stakeholders (6, 7)** should provide the MC with current information on maintenance needs, since usage and conditions on the road systems change. The MC should observe and report changes in road use and hazardous conditions as they arise. Conditions that may warrant reporting include unexpected use such as new or different tenure holders, dangerous trees, or overgrown brush on blind curves. If the maintenance system breaks down, other stakeholders could be held accountable, depending on where the system failure occurred.

Considerations

The maintenance system should ensure that:

- ✎ Roads are maintained to the standard for which they were designed and constructed
- ✎ Maintenance processes, practices, and equipment comply with all requirements
- ✎ The MC participates appropriately in pertinent investigations to ensure any maintenance issues are addressed

Plans

- ✎ Plans are reviewed regularly and information on hazards is provided to affected stakeholders
- ✎ A contact person for maintenance issues is specified to all stakeholders
- ✎ Maintenance is planned to meet the needs of all identified users and when requested or required should meet the special needs of users, such as hauling of oversized equipment
- ✎ Maintenance is planned so as to cause the least disruption possible to road users
- ✎ In **MEWPs (7)**, maintenance is coordinated with other road use functions to ensure safety is not compromised
- ✎ Maintenance schedules are adhered to, and warnings and information are provided when disruptive, unplanned maintenance is necessary
- ✎ Hazards created by maintenance are identified and there is a plan in place to mitigate them

Communication

Affected stakeholders are informed immediately of:

- ✎ Circumstances that could compromise safe use
- ✎ Planned maintenance, issues or activities that could affect safe use
- ✎ Structural road changes or previously unidentified issues as they are discovered
- ✎ Any road or maintenance changes that compromise travel particularly for emergency situations

Sample Documents

- ✎ Maintenance schedule
- ✎ Communication plans
- ✎ Safety program documents related to maintenance

Validation

- ✎ Discuss maintenance systems with other users
- ✎ Be observant to maintenance practices
- ✎ Review written communications

22 Maintenance Contractor (MC)

23 Other Traditional Owners/Licensees

This section applies to owners other than the default **PC (20, 21)**, as defined in the *WC Act*. The level of responsibility of these owners is restricted to their application of Section 119 of the *WC Act*. These owners are often also **employers (25, 26)** who use the road systems as work areas or for personal travel or transporting product and have specific **OHS obligations (2)**.

Obligations

All owners have *OHS* obligations under Section 119 of the *WC Act*.

Practice

All owners are part of the communication link between the PC, **MC (22)**, and any employers with whom they have a business relationship. They are part of the overall coordination system administered by the PC, and set compliance standards that serve to meet part of the PC's obligation to have a system for compliance under the *WC Act* and *OHS* regulation. They have control over employers and contractors with whom they have a business relationship, and therefore some administration of road safety is done through them.

Considerations

All owners should have a system that addresses communication of information, and coordination and compliance of all employers, contractors, and persons under their control.

Traditional owners' contribution to the management of the road systems includes:

- ✎ Having a section in their safety program that addresses resource road management and use
- ✎ Ensuring that all related users (employers) have a plan for safe road use as part of their safety program
- ✎ Having a system, which includes monitoring and enforcement, for ensuring compliance with the overall **SRUP (15)** by all **stakeholders (6, 7)** under their control, including contractors and occasional users
- ✎ Evaluating the road systems to ensure the **design and construction (4)** are adequate for their anticipated use
- ✎ Coordinating road usage under their control, in accordance with systems established by the PC. This coordination supports the SRUP
- ✎ Ensuring that maintenance systems provide sufficient safety for their planned routine use and any special use circumstances
- ✎ Evaluating planned changes in trucking or road use practices to ensure they are compatible with road design and will comply with the SRUP
- ✎ Utilizing a **risk assessment (8)**, regularly evaluating their management of roads and road use, and revising their systems as necessary
- ✎ Ensure there is no unauthorized use of the road by persons under their control
- ✎ If **occasional users (28)** under their control use the road, ensure a communication system is used for safe road use practices and a means for compliance

24 Other Traditional Owners/Licensees

Communication

- ✎ Planning regular communication with all users under their control to exchange information, including status of hazards
- ✎ Providing the name of a specific contact person to the **PC (20, 21)**, **MC (22)** and, if applicable, other owners for road-related issues
- ✎ Establishing a mechanism for reporting safety issues both directly to themselves and to the PC or MC as appropriate to ensure hazards are identified and mitigated



Owners' Support Functions

- ✎ Support an **RSMG (32)** if one is in place
- ✎ Review all road-related incident investigations and revise their systems if necessary
- ✎ Set a good example when using resource roads

Sample Documents

- ✎ **SRUP (15)**
- ✎ Documentation of hazard reporting system
- ✎ Owner/Contractor-related meeting minutes
- ✎ Related inspections and investigations
- ✎ Individual **risk assessments (8)**

Validation

- ✎ Review documents
- ✎ Observe road use by related employers
- ✎ Periodically attend safety management group committee meetings and/or related trucker meetings



MANAGEMENT AND USE OF ROADS



All stakeholders who use resource roads have OHS responsibilities to support the safe road use plans and maintenance of the roads they travel on.

25 Employers

An employer is defined in the *WC Act* and is a **stakeholder (6, 7)** who has one or more persons working for them and who may have independent operators under their direct control. An employer may also have *OHS* responsibility for other **occasional users (28)**, such as service vehicle operators that are on the road system on behalf of the employer. Employers control their use of the road, including equipment on the road and who they allow to use the road. This section refers to those employers who are road users or who influence road safety, including transport of product and/or workers and use of equipment.

Obligations

The employer's ***OHS* obligations (2)** are defined in Section 115 of the *WC Act*. Employers are obligated to provide *OHS* planning, information, training, and supervision for those under their control. They are further obligated to support road management systems and ensure that their employees follow safe road use practices. Employers also have *OHS* obligations to the owners and **PCs (20, 21)**.

Practice

All persons using the road systems for the purposes of work are likely directly related to an employer. Employers must ensure that workers can safely use the road systems. Employers facilitate this by establishing policies and programs directly related to road use and road safety. Because an employer may operate on several road systems at the same time, policies and programs must take into consideration the specific conditions for each of the road systems.



Considerations

Each employer's safety program should apply the principles of planning, communication, training, and supervision. Employers must also plan to meet employment standards.

Communication with the PC, responsible owner, and other users includes:

- ✎ Identification to the owner (default PC) the contact person responsible to the employer for road safety issues
- ✎ Following and supporting the coordination and compliance systems put in place by the responsible owner or PC
- ✎ Following the **SRUP (15)** put in place by the responsible owner or PC, including such factors such as radio protocols and speeds
- ✎ Providing a copy of their safety plan to the responsible owner or PC
- ✎ Planning for safe use of the specific road system, including risk assessments for each specific road to ensure all truck configurations, load types, and equipment can navigate the road system safely
- ✎ Reviewing SRUP limitations before making any changes in trucks or hauling practices to ensure there are no conflicts
- ✎ Communicating anticipated use and needs to other stakeholders
- ✎ Supporting the emergency preparedness protocols put in place by the owner or PC, and ensuring their own emergency training needs, procedures are addressed and effective

26 Employers

Employment Standards

- ✎ The use of hiring policies that support criteria based on specific driving needs for resource roads
- ✎ Ensuring all drivers/operators have appropriate licensing, tickets and certifications, and all TDG (**Glossary**) requirements are known and followed
- ✎ Having effective planned supervision that fits the trucking or operating circumstances on the road system; this supervision is part of monitoring and should be designed to validate safe driving



Roads

- ✎ Having evaluations of road maintenance requirements for routine travel and work as well as any special needs or requirements
- ✎ Having systems to gather information on road hazards including those that may be created by other users and communicating the hazards and means of mitigating the hazards to their workers; this may require putting in place specific safety procedures such as navigating steep grades
- ✎ Implementing an effective hazard reporting system

Vehicles and Loads

- ✎ Planning and implementing safe coordination and compliance of vehicle travel and equipment use for circumstances under their control
- ✎ Ensuring maintenance of trucks, trailers, and other mobile equipment
- ✎ Ensuring that incident investigations include truck and equipment issues
- ✎ Requiring periodic inspection of trucks, related equipment, and other equipment as required by regulation and manufacturer specifications
- ✎ Planning for loads to be safe, stable, and compliant with all requirements
- ✎ Setting standards and procedures for loading/unloading and ensuring they are communicated and adhered to

Each employer should review their programs and road use on a periodic basis to ensure effectiveness and that they are not in conflict with the SRUP.

27 Employer Responsibilities for Worker Transport

This section covers all vehicles such as pickup trucks, buses, quads (all-terrain vehicles), and snow machines used for work or by workers for non-work related travel on the road systems.

For transportation of workers, employers must ensure workers or contractors under their control have:

- ✎ All appropriate licensing is in place
- ✎ All users know and follow the **SRUP (15)**
- ✎ All road users are made aware of personnel transport vehicles on the road system, and use of transport vehicles is coordinated with other users to minimize hazards and risks



Vehicles

- ✎ A **risk assessment (8)** is conducted to ensure personnel transport vehicles are appropriate for the specific road system and that they can be operated within manufacturers' specifications
- ✎ Personnel transport vehicles and systems comply with all applicable regulations
- ✎ All required safety related equipment is in place including proper seating and seatbelts, and radios are in good operating condition
- ✎ Vehicles and equipment are inspected regularly, including ensuring that unstable or unsecured materials or loads do not endanger any persons

Road

- ✎ Road maintenance is planned and conducted to accommodate personnel transport vehicles

Operators

- ✎ Operators receive adequate information, instruction, and training to safely operate the specific vehicles on resource roads
- ✎ The safety program defines **OHS obligations (2)** of the personnel transport vehicle operator to ensure safety of themselves and passengers. In addition to other responsibilities, the operators of equipment and vehicles with passengers assume the role of supervision of those passengers when vehicles and equipment are involved
- ✎ Information on hazards and procedures for mitigating the hazards is provided to operators of personnel transport vehicles
- ✎ Through training and instruction, operators note weather and road conditions and operate as conditions dictate
- ✎ Operators are monitored and supervised

Passengers

- ✎ There is special provision for passengers to report unsafe conditions, acts, or near misses, and that these are investigated and appropriate action taken

28 Occasional Users

This part of the employer section refers to occasional users required to travel or work on the road system, including service vehicles, delivery trucks, and low beds for equipment. The employers of these workers have **OHS obligations (2)** to ensure they are provided with information, instruction, training, and supervision to use the road systems without undue risk to themselves or others.

Systems for safety with respect to occasional users should consider the following:

- Safe road use for occasional users must be planned. The coordination and compliance systems established by the responsible owner or PC or the requesting employer must have provisions for occasional users
- Users should minimize disruption of normal use to avoid compromising safety
- Regular occasional users should have a section in their safety program specific to resource road use

Note: When an employer does not have safe operating procedures for their workers, and a structure to comply with an **SRUP (15)**, the **stakeholder (6, 7)** that hires or contracts the occasional user must ensure appropriate precautions and procedures are in place.

- Users must be informed of safe road use protocols, road limitations, and road monitoring systems
- Users are made aware of any special hazards such as steep grades or blind corners that affect their safe use of the roads
- When reasonable, users' vehicles should be fitted with appropriate radios with proper channels. Users must know and follow road and radio protocols. Provisions must be made for vehicles traveling without radios
- The users' employer should ensure proper log entries and checklists are completed each time road travel is undertaken
- Risk assessments must be done to ensure roads can be used safely by the specific drivers/operators, with consideration of personal driving skills, experience, and vehicle limitations
- Issues or incidents involving occasional users must be investigated and appropriate action taken
- Reporting system when circumstances arise

The employer or stakeholder that hires these occasional employers or users also has some **OHS obligations** to provide information and identify requirements of safe use systems for these employers and workers.

Unique situations such as moving oversized equipment must be planned and coordinated. All persons affected must be informed of additional hazards and the mitigation. Unique road travel and use should be carried out as much as possible in "off heavy" traffic time.

All safe use practices should be applied and some monitoring of occasional users should be in place

28 Occasional Users

29 Working Equipment Traveling/Working on Road

The employer, the operators, and other road users all have **OHS obligations (2)** when equipment is being transported along the road or working on the road or roadside.

Safety systems should include:

Planning

- Plans must be made for circumstances in which equipment will be traveling or working on the road
- Unique situations, such as moving oversized equipment, must be planned and coordinated
- All persons affected must be informed of additional hazards and plans for mitigation of the hazards. Such road use should be carried out as much as possible in low traffic times



Roads

- Consideration of road limitations, including bridges, before equipment travel is permitted
- Confirmation that the specific equipment can be operated on the road system within manufacturer's specifications
- Coordination and compliance systems addressing the unique issues of the specific equipment travel or work on the road
- Plans for road travel to ensure the least disruption and interaction with other traffic
- Communication to all affected **stakeholders (6, 7)** regarding equipment on the road and possible hazards, either directly or through proper signage, and effective traffic control
- Documentation of road use by equipment

Equipment

- Proper inspection and maintenance of equipment by the operator before road use
- When carrying out roadside loading, adherence to all safe loading procedures so that trucks are not overloaded
- When feasible, provision of the proper radios and adherence to appropriate radio protocols; if roads are not radio-assisted additional planning and precautions must be taken to protect all persons

Operators

- Specific training and instruction for operators to travel and work on the road systems
- Communication to operators about all known hazards and plans for mitigating the hazards
- Systems in place to ensure adequate supervision

Sample Documents

- SRUP (15)**
- Traffic control procedures
- Safety program elements
- Meeting minutes
- Inspection Reports
- Accident investigation

Validation

- Review document records
- Observe equipment working on road system
- Review supervision log
- Interview workers about instruction they receive

30 Worker/Driver/Operator

Any person who operates a vehicle or equipment on or around the resource road systems is obligated to ensure their own safety and the safety of others. Workers, drivers, and operators are the end users for whom all safe road use planning, policies, and procedures are established. It is these users' interactions with their equipment, the environment, and each other that must be coordinated and controlled. Each person in the workplace has **OHS obligations (2)** to these end users, whether they have direct working relationships with them or not. However, it is incumbent upon the end users to participate in the development of procedures, use the procedures effectively, and fulfill personal obligations of care and professionalism to maximize the safety of all.

All employers who have workers operating or travelling on the road systems should be aware of the workers' duties and provide the support necessary to ensure they are able to meet their **OHS obligations**.



Obligations

The worker's application of **OHS obligations** on road systems differ somewhat from other workplaces, as there is constant interaction with other persons over whom they have no control. Nevertheless, the general **OHS obligations** in Section 116 of the *WC Act* still apply.

Practice

In a broad sense, public users of the road systems can be considered to be "workers/operators" and be given the same information and instructions that will allow them to operate safely on the road systems.

Considerations

Regardless of what systems and processes various **stakeholders (6, 7)** implement, the end users (workers/drivers/operators) have the most control of and influence over immediate circumstances. Each user must be committed to personal safety and the safety of others on the roads. This commitment can be considered as "having a personal safety plan or program."

In discussions on worker/driver/operator (users) involvement, consider whether they:

- 📌 Know and follow the **SRUP (15)**
- 📌 Actively participate in coordination systems and special meetings
- 📌 Are aware of and implement their employer's safety program as it relates to road use
- 📌 Support **RSMGs (32)** or other employer initiatives related to safe road use and actively support campaigns such as safety corridors, trucker days, and "share the road" programs
- 📌 Ensure their use of the road system complies with the SRUP
- 📌 Understand, demonstrate, and fulfill their responsibilities and contributions to the system

31 Worker/Driver/Operator

Driving/Operating

- ✎ Drive defensively and give right of way to loaded or less-maneuverable equipment
- ✎ Operate within speed limits and according to seasonal road conditions
- ✎ Recognize and use safe practices when parking on roadways or using roads for other work purposes
- ✎ Accept responsibility for passengers' safety when transporting other persons

Reporting

- ✎ Report to their employer and any other appropriate **stakeholders (6, 7)** any issues or concerns with the road system or road maintenance
- ✎ Ensure they are informed of known hazards and procedures for mitigation of hazards
- ✎ Communicate immediately any road issues that may cause immediate concern to other users, including the general public, or unexpected equipment on the road
- ✎ Use **employer (25, 26)** and **PC (20, 21)** reporting systems to report driver near misses
- ✎ Participate as appropriate in investigations
- ✎ Support the effective supervision system through open communication and reporting of issues

Vehicles

- ✎ Check their vehicle before starting and refuse to drive or operate the vehicle if it is unsafe to do so
- ✎ Carry out daily inspections and routine equipment checks such as brake checks
- ✎ Take responsibility for their equipment and have a system to carry out equipment maintenance
- ✎ Recognize the limits of the vehicle or equipment when operating on areas such as steep grades, and use appropriate procedures as necessary
- ✎ Make sure that, on each trip, load limitations of the vehicle or road system are not exceeded

Personal

Ensure they:

- ✎ Are capable of, qualified to, and comfortable with, driving the vehicles they are operating
- ✎ Are personally fit to do the job – are physically capable of driving the expected number of hours, chaining up and securing loads
- ✎ Are aware of any personal limitations that could affect their safe use of the specific road system
- ✎ Do not exceed personal fatigue tolerances
- ✎ Support zero tolerance for drugs or alcohol that may affect safety at work
- ✎ Keep logbooks to document care and professionalism

Sample Documents

- ✎ Inspection reports
- ✎ Logbooks
- ✎ Meeting minutes
- ✎ Reported hazards and issues
- ✎ Incident/accident Investigations

Validation

- ✎ Observations of whether the operator is following procedures such as brake checks
- ✎ Review of employers' safety plan
- ✎ Review of **SRUP (15)**

32 Road Safety Management Groups (RSMGs)

Although it may not be their primary function or obligation, RSMGs are a tool that may be used to manage *OHS* responsibilities on resource roads. This section deals with various possibilities for the use of an RSGM in managing and coordinating *OHS* on resource roads. The obligations of various stakeholders remain with the **stakeholders (6, 7)** themselves.

Obligations

An RSGM has no obligations under the *WC Act*. Each stakeholder is still responsible under the *WC Act* to ensure that their ***OHS* obligations (2)** have been met. Please see the relevant flips for the responsibilities of each stakeholder.

Stakeholders, People and Equipment

Depending on the users of a road supported by an RSGM, the RSGM may be comprised of several stakeholders, such as licensees and/or contractors, with participation by various ministries such as MFR (**Glossary**), Energy, Mines and Petroleum Resources, BCTS (**Glossary**), RCMP, WorkSafeBC, or nearby communities using the road, as well as other possible combinations.

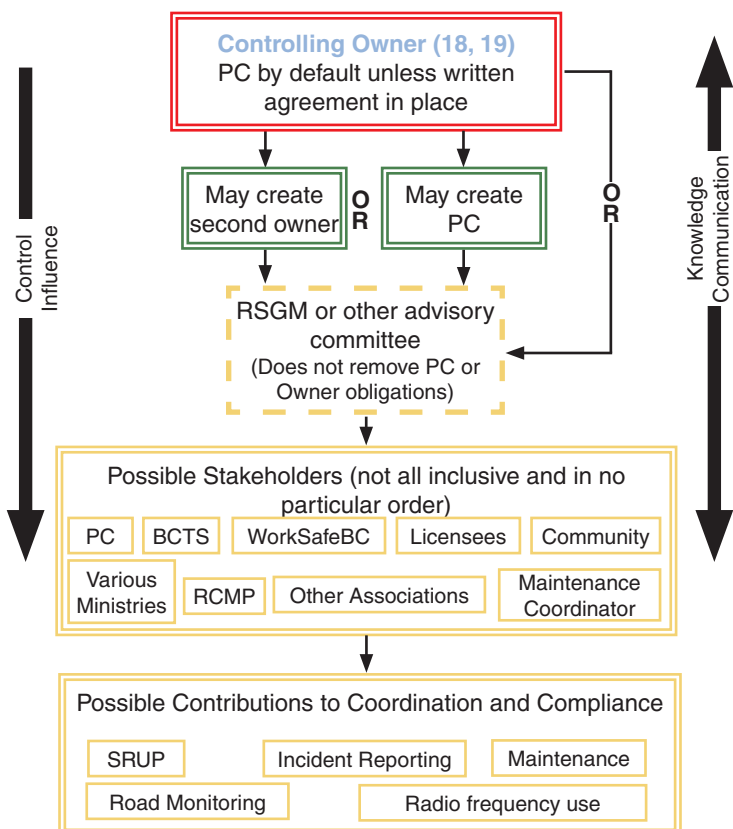
Practice

By working with the owner or PC, an RSGM can assist in coordination, communication and management on resource roads.

Considerations

What an RSGM can do in the area of health and safety:

- Develop safety plans
- Establish **SRUP (15)**
- Establish radio protocol and frequency
- Monitoring and an effective enforcement of road usage
- Sample Documents
- Meeting minutes



Glossary

BCFSC – BC Forest Safety Council

BCTS – BC Timber Sales

Control – In the context of this document, having the ability and authority to deal with all employers on the road system to ensure minimum health and safety standards are addressed and adhered to. It implies that the assigned or default prime contractor will have the ability to put in place health and safety systems for coordination and compliance. Control is of the utmost importance to the person or entity that has OHS responsibilities under section 118 of the Act. Any owner who has control over some aspect of the coordination and compliance for health and safety on a road system and authority over use must delegate this authority to the prime contractor

Knowledge – In the context of this document, having information and understanding of hazards and associated risks concerning a road system. Under section 119 of the Act, an owner's knowledge must be conveyed to other stakeholders so they are aware of the hazards and can mitigate the risks

MEWP – Multiple Employer Workplace A "multiple-employer workplace" means a workplace where workers of 2 or more employers are working at the same time

MFR – Ministry of Forests

OHS Regulation – Occupational Health and Safety Regulation

PC – "Prime Contractor" (PC) means, in relation to a multiple-employer workplace, the main contractor who enters into a written agreement; when there is no signed agreement the owner retains OHS responsibility of 118 of the WC Act

PPE – Personal Protective Equipment

RRSP / Matrix – Resource Roads Safety Practices. Detailed stakeholder responsibilities document, available online at www.worksafefbc.com. Can be used as a supplement to this info-flip

RSMGs – Road Safety Management Groups – See page **32** for more information

SRUP – Safe Road Use Plan. Page **15** details considerations that take into account road hazards and the coordination on an MEWP

TDG – Transportation of Dangerous Goods

WC Act – Workers Compensation Act