

Backgrounder: Occupational first aid regulatory changes

This backgrounder was updated in November 2023 to provide additional details and guidance.

In April 2023, WorkSafeBC's Board of Directors approved amendments to Part 3 of the Occupational Health and Safety (OHS) Regulation, relating to the provision of occupational first aid. These amendments will take effect November 1, 2024, to give employers time to obtain any required first aid training and equipment necessitated by these changes.

Background

The requirement to provide first aid services appropriate to the workplace is a basic responsibility of all employers. The requirements for first aid listed in Schedule 3-A of the OHS Regulation have been in place for almost 20 years with minimal updates.

Over this time, there have been improvements in both first aid training and equipment, as well as the issuance of two standards from the Canadian Standards Association (CSA):

- CSA Z1210-17 First aid training for the workplace — Curriculum and quality management for training agencies
- CSA Z1220-17 First aid kits for the workplace

These standards provide national guidance on workplace first aid training programs and first aid kits.

WorkSafeBC also identified challenges with the current regulatory requirements related to appropriate emergency transport for injured workers in remote areas.

Objective of the regulatory amendments

The purpose of the amendments is to strengthen the current requirements in Schedule 3-A, with a focus on high-risk remote industries, and to harmonize the OHS Regulation with the first aid training and first aid kits framework in CSA Z1210-17 and CSA Z1220-17.

Key amendments

Determining first aid requirements

Under the amended OHS Regulation, employers will have a two-part duty to establish their workplace first aid requirements through both of the following:

- Provide at least the supplies, facilities, and first aid attendants required by Schedule 3-A
- In consultation with workers, perform a written risk assessment for each workplace to determine any additional equipment, supplies, facilities, attendants, and services necessary to ensure injured workers can be promptly provided first aid and transported to medical treatment

Schedule 3-A has also been amended to consider four workplace characteristics when determining the minimum levels of first aid supplies, facilities, and attendants required:

- Number of workers at the workplace
- Hazard rating assigned to industry
- Whether the workplace is “remote” — meaning it is more than 30 minutes surface travel time from the nearest ambulance station
- Whether the workplace is “less accessible” — meaning it cannot be safely accessed by ambulance, or that it includes one or more hazardous work areas that cannot be safely accessed by ambulance personnel

These changes to Schedule 3-A may result in the first aid requirements for some workplaces changing. It is important that employers review and plan for these new requirements.

Guidance on “less-accessible” workplaces:

“Less-accessible” workplaces include workplaces that either:

- a) Cannot be reached by an ambulance travelling by land, or
- b) Have work areas where BC Emergency Health Services (BCEHS) ambulance attendants cannot safely access

BCEHS ambulance personnel are not permitted to enter hazardous areas and will not perform rescue activities, so employers must have first aid attendants with an appropriate level of training and equipment to safely transport workers to an area accessible to BCEHS.

Workplaces that would typically be considered less accessible include those where first aid can typically be provided during transport, or rescue operations.

Such areas include:

- Areas at immediate risk of avalanche
- Areas that are only accessible by ladders, scaffold, or temporary work platforms
- Backcountry areas not accessible by an ambulance travelling by land
- Areas with rough or complex terrain that would require an injured worker to be carried for a significant distance
- Areas where the only means of access involves steep or slippery slopes or embankments without walkways or trails
- Radio-controlled areas, unless resources exist to escort or direct an ambulance safely through these areas
- Underground workings (tunnels)

Other areas that are generally inaccessible to BCEHS include:

- Confined spaces
- Areas within the limits of approach to high-voltage electrical equipment (where prompt de-energization is not possible)
- Areas where specialized personal protective equipment (PPE), beyond standard precautions for biological hazards, is required to prevent harmful exposures to hazardous materials — including chemical, biological, and radiological hazards
- Areas where oxygen deficient or toxic atmospheres may exist
- Workplaces at high angles or where a fall hazard exists
- Areas with risks of entrapment
- Boats or areas on or over water, unless protected by guardrails

When these areas exist in a workplace, employers must consider a rescue plan for workers working in these areas when determining if the workplace should be considered less accessible. If an injured worker can be immediately and safely rescued from a hazardous area to an area that is otherwise accessible to BCEHS, the workplace will generally not be classified as less accessible.

Employers may also consider procedures to prevent workers from accessing less-accessible areas. If workers are not normally required or permitted to work in areas that are not accessible to BCEHS, employers may consider the workplace as not less accessible for the purpose of establishing minimum first aid requirements. When work is performed in less-accessible areas, employers must implement procedures to address emergency rescue and additional first aid requirements, as necessary.

Alignment with CSA Z1210-17 workplace first aid training standard

Alignment with CSA Z1210-17 will affect both the naming conventions and course duration of first aid programs, while enhancing requirements for program quality control.

Current program name	Duration	2024 program name	Duration
OFA 1	1 day	Basic First Aid	1 day
OFA 2	5 days	Intermediate First Aid	2 days
OFA 3	10 days	Advanced First Aid	10 days

Note: Transportation Endorsement is not affected by alignment with the CSA Z1210-17.

A Level 1, 2, or 3 first aid certificate issued before November 1, 2024, will be considered Basic, Intermediate, or Advanced, respectively.

Intermediate First Aid courses will be two days in duration for initial certification. This is a decrease in course duration from the OFA (Occupational First Aid) 2 program, which is currently five days. This change in course duration and course content was incorporated into the design of the revised Schedule 3-A.

CSA Z1210-17 aligned training in B.C.

WorkSafeBC is anticipating that CSA-aligned training programs will be available to workers and employers by June 2024.

First aid kit equipment requirements

First aid kit requirements are changing to align with CSA Z1220-17. A summary of these changes is as follows:

Current first aid requirements	2024 first aid equipment requirements
Personal Kit	CSA Z1220-17 Personal Kit
Level 1 First Aid Kit	CSA Z1220-17 Basic Kit (Medium)+ tourniquet + PPE
Level 2 First Aid Kit	CSA Z1220-17 Intermediate Kit (Medium) + PPE
Level 3 First Aid Kit	CSA Z1220-17 Intermediate Kit (Medium) + Oxygen Therapy Kit + PPE

Note: Changes to ETV (Emergency Transport Vehicle) equipment, first aid room equipment, and dressing station equipment are minor, and will reflect changes in terminology and the inclusion of new materials into first aid kits (e.g., the number of splints required in a first aid room will decrease because they are included in CSA kits).

Detailed kit content lists will be available in the Spring of 2024.

Employers are expected to move to these new contents as new kits are purchased or supplies are replaced. Existing kits should be supplemented with any significantly different components required in the equivalent CSA-aligned kit, however there is no expectation for employers to dispose of existing first aid supplies that are the same.

Emergency transportation

The amendments allow for more flexibility in the type of emergency transportation selected, while providing performance-based requirements all emergency transportation must now meet, including:

- Being capable of safely transporting both a first aid attendant and the injured worker on a secured stretcher
- Having an effective means of communication between the first aid attendant and the operator of the transportation
- Being designed and equipped to secure injured workers, protect from natural elements and dust, maintain normal body temperature, and allow adequate space for the first aid attendant to provide treatment to the injured worker

If air transportation is the primary or only method of emergency transport, employers will be required to ensure that an appropriate aircraft is available when work is occurring, and that compatible stretchers are available.

Guidelines and resources under development

WorkSafeBC is developing guidelines and additional resources on the following topics to support employers in implementing the new requirements:

- Conducting first aid assessments and developing written procedures
- What factors constitute a “less-accessible” workplace
- How to count workers for the purpose of determining minimum requirements for first aid
- Required contents for first aid kits
- Requirements for dressing stations and first aid rooms
- Requirements for emergency transportation

Updates will be released early 2024. Resources will be published on [worksafebc.com](https://www.worksafebc.com) : [First aid requirements](#).

Important dates

- Additional guidance and updates, including detailed equipment lists — early 2024
- Draft guideline release for public review — early Spring 2024
- CSA-aligned training curriculum available — June 2024
- Effective date of OHS Regulation amendment — November 1, 2024

For more information

Details of the changes, including explanatory notes, are available on our website: [Part 3 – Minimum Levels of First Aid](#).