

Backgrounder: Occupational first aid regulatory changes

WorkSafeBC's Board of Directors has 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.

This backgrounder was updated in June 2024 to align guidance with the preliminary revision of the [OHS Guidelines](#) associated with these regulatory amendments. The guidelines have been posted as a resource to help employers determine the first aid services required for their workplace once the amendments to the Regulation come into effect.

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 has 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. They must:

- Provide at least the supplies, facilities, and first aid attendants required by Schedule 3-A
- In consultation with workers, perform a written first aid 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 the industry
- Whether the workplace is “remote” — meaning it is more than 30 minutes surface travel time from the nearest BC Emergency Health Services (BCEHS) ambulance station
- Whether the workplace is “less accessible” — meaning it cannot be safely accessed by BCEHS ambulance, or that it includes one or more hazardous work areas that cannot be safely accessed by BCEHS 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 a BCEHS ambulance travelling by land, or
- b) Have work areas 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 should be considered less accessible include:

- Backcountry areas that are only accessible by ATV, snowmobile, or similar means
- Areas where the only means of access involves steep or slippery slopes or embankments (without walkways)
- Areas with rough or complex terrain
- Areas where there is a significant risk of avalanche, landslide, flood, or other natural hazards

Other areas that are generally inaccessible to BCEHS include:

- Confined spaces or where there is a risk of entrapment
- Underground work
- Excavations
- Areas that are only accessible by ladders, scaffold, or temporary work platforms
- Areas where work is done at high angles, or where an unguarded fall hazard exists
- Areas where a drowning hazard exists (work on or over water)
- Areas requiring specialized personal protective equipment (PPE) or areas where hazardous atmospheres may exist

Workplaces where workers may be working in hazardous areas should also be considered less accessible, except where both of the following conditions are met:

- The workplace is not remote and not otherwise less accessible.
- The employer has developed alternative provisions to safely rescue workers in accordance with the requirements of section 4.13 of the Regulation.

Safe rescue will generally include having equipment and trained personnel available to move an injured worker from a hazardous area to an area accessible to BCEHS in a way that will not cause additional injury or exacerbate pre-existing injuries or illnesses. It is also expected that immediate and ongoing first aid will be provided to the injured worker during the rescue, where reasonable to do so. The level of first aid provided during rescue should be sufficient to address injuries likely to arise in the less-accessible area.

Workplaces located on roads that cannot be made accessible to BCEHS ambulances must be considered both less accessible and remote.

Alignment with CSA Z1210-17 workplace first aid training standard

Alignment with CSA Z1210-17 affects both the naming conventions and course duration of first aid programs.

| 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 CSA Z1210-17.

A Level 1, 2, or 3 first aid certificate issued before November 1, 2024, will be considered equivalent to basic, intermediate, or advanced, respectively until its natural date of expiry (up to November 1, 2027).

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 revised Schedule 3-A.

CSA Z1210-17-aligned training in B.C.

WorkSafeBC is anticipating that approved CSA-aligned training programs will be available to workers and employers in July 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 emergency transport vehicle equipment, first aid room equipment, and dressing station equipment are minor and reflect changes in terminology and the inclusion of new materials in 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 are available in the [OHS Guidelines](#).

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 substantially the same, with only minor differences in sizes or descriptions.

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. These include:

- Being capable of safely transporting both the injured worker (secured to a stretcher) and a first aid attendant
- 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.

Additional resources under development

In addition to the guidelines, WorkSafeBC is developing the following resources to support employers in implementing the new requirements:

- First aid assessment templates
- Recommended contents for first aid kits, first aid rooms, and dressing stations
- Frequently asked questions
- Webinar

As they become available, resources will be published on our website: [First aid requirements](#).

For more information

Details of the Regulation changes, including explanatory notes, are available on our website: [Part 3 – Minimum Levels of First Aid](#). The preliminary [OHS Guidelines](#) are also available for additional information and support.