



March 10, 2021

First Aid Modernization Proposal  
Health, Safety and Insurance Policy Branch  
Ministry of Labour, Training and Skills Development  
400 University Avenue, 14th Floor  
Toronto ON M7A 1T7  
[WebHSpolicy@ontario.ca](mailto:WebHSpolicy@ontario.ca)

Dear Sir or Madam,

First Aid Modernization Consultation

The Council of Ontario Construction Associations (COCA) is a federation of 29 construction associations which represents 10,000 general contractors and trade contractors that operate in all regions of the province in the industrial, commercial and institutional (ICI) segment of the construction industry. Our membership includes construction enterprises of all sizes and that are both unionized and non-union. COCA is the largest, most diverse and most representative voice for the non-residential construction sector in Ontario.

We are pleased to have this opportunity to provide advice with regard to the modernization of Ontario's first aid regulation as follows:

**Section I – First Aid Regulation**

**A. Would you have any concerns with the potential extension of workplace first aid requirements to your workplace, particularly if you are an employer that is not currently covered by existing first aid requirements?**

This question is not applicable to COCA as the construction industry is covered under the existing regulation under the Workplace Safety and Insurance Act. This information should be solicited from employers that do not fall under the WSIA to determine if first aid requires more regulation in their workplaces.

**Section II – First Aid Training and Training Provider Standards**

**A. Do you have any concerns with incorporating the requirements of Regulation 1101 related to first aid stations and rooms into a new OHSA regulation?**

We do not have any concerns regarding the incorporation of Regulation 1101 under the WSIA into a new regulation addressing first aid stations and rooms under the OHSA.

**B. Are there any unique first aid requirements that should be considered for workplaces where remote work occurs?**

Where remote work occurs, a hazard assessment must be carried out to determine additional requirements for first aid training and supplies. We suggest that this section of the regulation set a minimum requirements for both supplies (trauma/crisis first aid kits) and training (minimum C level or BLS first aid training).

**Section II – First Aid Training and Training Provider Standards**

**E1. What concerns, if any, do you have about the content of the CSA Z1210-17 standard as the ministry determines whether to adopt or incorporate elements into an approved CPO standard? Please explain.**

We agree that the CPO should develop standards for workplace first aid training programs and for the workplace first aid training providers. These standards should be based upon the CSA standards to ensure a high degree of consistency across Canadian jurisdictions but should be adapted wherever necessary to best suit Ontario's workplaces.

We greatly appreciate this opportunity to provide our advice on this important matter.

Sincerely,



Ian Cunningham  
President