

Eye and Face Protection Compliance Game Plan



7 things to do to prevent eye and face injuries and OHS violations.

If statistical averages hold true, by the time you finish work today, approximately 200 Canadian workers will have suffered an on-the-job eye or face injury. And those statistics don't account for eyestrain and fatigue that builds up and causes injury over time. Leading causes of eye and face injury include:

- Flying particles from drilling, cutting, digging and other similar operations;
- Dust and dirt;
- Arc flash;
- Ultraviolet radiation from welding and electrical work;
- Abrasives from sandblasting;
- Splashes of molten metal or liquids, such as hazardous chemicals, irritants and corrosives; and
- Fibers from insulating materials, such as fiberglass.

Most eye and face injuries can be prevented via use of appropriate PPE. Ensuring proper use of eye and face PPE at your workplace can also keep you out of trouble with OHS inspectors. Here's a look at [OHS eye and face protection requirements](#) and a 7-step game plan for complying with them.

Defining Our Terms

This analysis covers general OHS eye and face protection rules. Be aware that most jurisdictions also have separate protection requirements for workers who perform operations involving high hazards of eye injuries, such as welding or electrical servicing posing risk of arc flash. For simplicity's sake, we'll use the term 'eye injury' or 'eye hazards' to refer to both eye and face injuries, except where the context requires otherwise.

Step 1. Perform Eye and Face Injury Hazard Assessment

The first step in the compliance process is to have a qualified person identify

and assess eye injury hazards at your site. In BC and Yukon, the hazard assessment must be done in consultation with the workplace JHSC or health and safety representative. Operations posing high risk of eye injury include:

- Use of compressed air;
- Operation of chainsaws, powder-actuated and other power tools;
- Arc welding and other hot work;
- Servicing of electrical equipment;
- Handling of hazardous chemicals and molten substances;
- Grinding and buffing; or
- Operation of an all-terrain vehicle or snow mobile.

Step 2: Try to Engineer Away Eye Hazards

Canada OHS laws follow the so-called hierarchy of controls approach to managing hazards, at the top of which is total hazard elimination via substitution, engineering and/or work design solutions. **Example:** Eliminating tasks that pose eye hazards or use or installing a physical barrier like a screen to shield workers from flying sparks, particles or debris. If substitution or engineering controls aren't reasonably practicable, employers must use administrative or work controls to manage the hazard. PPE is the safety measure of last resort to be used only when there's no way to eliminate or control the hazard via engineering and administrative methods.

Step 3: Ensure Eye Protection Meets CSA Z94.3

If PPE is necessary to guard against eye injury hazards, ensure that the PPE used meets the required standards. Most jurisdictions require eye protection to meet some version of either CSA Z94.3, *Eye and Face Protectors*, or ANSI Z87.1, *Occupational and Educational Personal Eye and Face Protection Devices*, but there are variations:

Jurisdiction(s)	Required Standard for Eye & Face Protection PPE
Federal	CSA Z94.3
Alberta	CSA Z94.3-99, CSA Z94.3-02, or CSA Z94.3-07; Lenses: ANSI Z87.1-1989, or ANSI Z87.1-2003
British Columbia	CSA Z94.3-07, or CSA Z94.3-15, or ANSI/ISEA Z87.1-2015
Manitoba	CSA Z94.3-15, and CSA Z94.3.1-16 Guideline
New Brunswick	CSA -Z94.3-15, or alternative standard offering at least equivalent protection
Newfoundland	CSA Z94.3; Lenses: ANSI Z87.1
Nova Scotia	CSA Z94.3
Ontario	Not specified
Prince Edward Island	CSA -Z94.3-15, or alternative standard offering at least equivalent protection
Qu�bec	CSA Z-94.3
Saskatchewan	Not specified
Northwest Territories/ Nunavut	Not specified

Jurisdiction(s)

Yukon

Required Standard for Eye & Face Protection PPE

CSA Z-94.3-02, ANSI Z87.1-2003, or similar standards acceptable to the YWCHSB

Explanation: CSA Z94.3 lists equipment standards for 7 basic classes of eye protection listed in reverse order of the degree of protection they provide:

Class 1, Spectacles: Class 1A spectacles provide impact protection with side protection, and Class 1B provide impact and radiation protection with side protection.

Class 2, Goggles: There are 3 subclasses of goggles:

- Class 2A goggles provide impact protection with direct ventilation;
- Class 2B goggles provide impact, dust and splash protection and are either non-ventilated or indirectly ventilated; and
- Class 2C goggles are either Class 2A or 2B goggles with radiation protection.

Class 3, Welding helmets, which come in a variety of configurations.

Class 4, Welding hand shields, which are also available in various configurations.

Class 5, Non-rigid helmets (hoods), which has 4 subclasses:

- Class 5A hoods have an impact-resistant window;
- Class 5B hoods protect against dust, splash and abrasive materials;
- Class 5C hoods protect against radiation; and
- Class 5D hoods are intended for high-heat applications.

Class 6, Face shields. There are 3 subclasses of face shields are:

- Class 6A face shields provide impact and splash protection;
- Class 6B face shields offer radiation protection; and
- Class 6C face shields are intended for high-heat applications.

Class 7, Respirator facepieces, which is broken down into 4 subclasses:

- Class 7A respirator facepieces provide impact and splash protection;
- Class 7B respirator facepieces are Class 7A facepieces with radiation protection;
- Class 7C respirator facepieces have loose-fitting hoods or helmets; and
- Class 7D respirator facepieces are Class 7C facepieces with radiation protection.

The CSA standard includes detailed information on which of the above types of eye protection are appropriate based on the various kinds of eye hazards.

Compliance Pointer: Another non-PPE form of eye protection you may have to provide is an eye wash station, fountain or equipment for removing irritants that get into a worker's eye.

Step 4: If Necessary, Furnish Workers Required PPE at Your Own Expense

The question of who furnishes and pays for required head protection varies by jurisdiction:

- Employer must furnish eye and face protection at no expense to worker: BC, MB, NB, NT, NU, QC, SK, YK;
- OHS laws don't say who must furnish and pay for eye and face protection: FED, AB, NL, NS, ON, PEI.

Strategic Pointer: Keep in mind that the employer is responsible for ensuring that the required PPE meets OHS standards, regardless of who provides and pays for it. So, as a practical matter, paying for the equipment may be a worthwhile price to pay for keeping the control you need to ensure compliance.

Step 5. Ensure Proper Use & Maintenance of Eye Protection

As employer, you're responsible for ensuring that workers properly use and maintain the eye protection they're required to wear. So, establish clear safety rules and policies requiring, among other things, that ensure that their PPE fits properly. In addition, eye and face protection shouldn't create any safety hazards, for example, by obstructing the worker's field of vision. It's also important to ensure workers properly maintain their eye and face protection. At a minimum, require them to:

- Inspect their PPE before each use for any kind of damage, such as scratches, bent ear stems or cracks in the lenses;
- Report any damage in eye or face protection to their supervisor and use substitute PPE until the problem is properly fixed;
- Clean their PPE regularly following the manufacturer's instructions, for example, by avoiding use of cleaners that could scratch the lenses; and
- Store their PPE in a case or other clean, dry place where it can't be damaged when they're not using it.

Step 6. Implement Rules for Use of Prescriptive Eyewear & Contact Lenses

Your policy also needs to address workers who wear prescription glasses. Regular prescription glasses don't count as and can't be used instead of required eye protection. However, several jurisdictions, including AB, BC, NL and YK allow for use of prescription eyewear if it's designed for the purpose of being PPE and it meets CSA Z94.3 and/or the lenses meet ANSI Z87.1. Lenses should be made of plastic or safety-treated glass, but not regular glass that can shatter, unless they're worn under proper face protection.

Several jurisdictions expressly ban workers from wearing contact lenses if they're exposed to potentially irritating airborne chemical agents, radiation, arc flash, intense heat, liquid splashes or other similar agents. Others require employers to make adequate safety arrangements to protect workers who use contact lenses in the workplace. In either case, you should require workers who

intend to wear contact lenses on the job to notify you of this immediately and take the necessary precautions to protect them.

Step 7: Train Workers in Eye Protection Rules

Every worker required to use eye and face protection must, before first use, receive training and instruction from a supervisor or other qualified person covering, at a minimum:

- How the equipment works;
- Why the worker must wear it;
- Any limitations in the protection the equipment provides;
- How to properly use, maintain, inspect and store the equipment; and
- How to carry out the applicable safe work procedures for operations requiring use of the equipment.

Be sure to verify that workers understand and are capable of applying their training and keep written records documenting the training provided, who furnished it and the date and time of training.