

Fall Hazards: Does Your Workplace Need a Fall Protection Plan?



Falls are the leading cause of workplace injury in Canada. According to the Canadian Centre for Occupational Health and Safety, approximately 60,000 Canadian workers are injured each year due to falls. This number represents about 15 per cent of the lost-time injuries that were accepted by workers' compensation boards across the country. In Manitoba alone:

1. There were 903 falls from heights in 2007;
2. One in twenty time-loss injuries are caused by falls from heights; and
3. One in 10 acute hazard fatalities are caused by falls from heights.

Naturally, the OHS laws require employers to protect workers from fall hazards. All jurisdictions require employers to both protect workers from falling (such as by installing guard rails) and protect them if they should fall (such as by providing and requiring workers to use fall arrest systems). But some jurisdictions go further and require employers to implement fall protection plans. We'll tell you if your jurisdiction requires fall protection plans, why your company should have such plans even if they're not expressly required to and how to comply with the fall protection plan requirements.

ONLINE RESOURCE: Click [here](#) to download a Fall Protection Equipment Inspection Checklist.

WHAT THE LAW SAYS

Every jurisdiction's OHS laws require employers to take precautions to protect workers from fall hazards. But they don't all require fall protection plans:

6 Fall Protection Plan Jurisdictions. The OHS regulations of six jurisdictions' AB, BC, NL, PE, SK and YK specifically require employers to have fall protection plans in specific circumstances, such as if workers could fall more than three metres and aren't protected by guardrails. These regulations generally spell out:

1. When a fall protection plan is required;
2. What that plan must address or include;

3. Availability of the plan at the workplace; and
4. Training of workers on the plan.

In some parts of Canada, government guidelines provide additional information on fall protection plans. For example, BC's *OHS Regulation* says employers must have written fall protection plans but doesn't spell out what those plans should include. These specifics are supplied in guidelines from WorkSafeBC. And in Alberta, the explanation guide to the *OHS Code* discusses whether unique fall protection plans are required for each worksite, an issue that isn't covered in the Code itself.

Manitoba. Manitoba's *Workplace Safety & Health Regulations* don't specifically require fall protection plans. However, they do require employers to develop and implement safe work procedures to prevent falls, train workers on these procedures and ensure compliance with them. And the items that these safe work procedures are required to cover are very similar to the requirements for fall protection plans in the six plan jurisdictions. Thus, although the Manitoba regulations don't use the phrase 'fall protection plan,' the required safe work procedures for fall hazards are essentially the same thing. So we'll treat Manitoba as a jurisdiction requiring fall protection plans.

7 No Fall Protection Plan Jurisdictions. The remaining seven jurisdictions' Fed, NB, NT, NS, NU, ON and QC don't expressly require employers to have fall protection plans. But a strong argument can be made for having such plans anyway. To develop a fall protection plan, you'll have to evaluate the risk of fall hazards, address all aspects of those hazards in writing and train workers on the appropriate safety procedures to minimize those hazards. In other words, creating and implementing a fall protection plan requires to you take all reasonable steps to protect workers and ensure compliance with fall protection requirements. This requirement is also spelled out in the 'general duty' clause of every OHS act in Canada. And it's also what your company has to do to exercise due diligence. Thus, if you voluntarily create and implement effective fall protection plans in your workplace when appropriate, it's likely that your company will be able to prove due diligence if it's ever charged with violating the jurisdiction's fall protection requirements.

HOW TO COMPLY

Here's an overview of everything you need to know to comply with fall protection plan requirements'whether such plans are expressly mandated under the OHS laws or indirectly implied via operation of the general duty clause.

When Fall Protection Plans Are Required

The OHS laws generally require fall protection plans in three situations:

Workers are at risk of falls from a certain height from an area without guardrails. The OHS regulations require fall protection for workers working at minimum elevations (three meters in most of the country and 2.4 meters under federal law) or at lower elevations if there's an unusual risk of injury from a fall. Similarly, the requirement to implement a fall protection plan is often based on minimum elevations. For example:

- AB and SK require a fall protection plan (or, in MB, safe work procedures) if the worker could fall from three metres or more; and

- BC and YK require a fall protection plan if the worker could fall 7.5 metres or more and there aren't any guardrails or similar barriers in place.

Whenever a fall protection system is used. In MB, NL and PE, a fall protection plan is required any time a guardrail, fall protection or personnel safety net system is used in the workplace.

Fall arrest systems can't be used. In BC, a fall protection plan is also required when there's a fall hazard but use of a fall arrest system isn't practicable or would actually be hazardous.

What Plan Must Include

All fall protection plans must be in writing. What those plans should include varies slightly by jurisdiction. (See the chart on page 14 for the necessary components of fall protection plans in each jurisdiction that requires them.) Alberta has the most comprehensive list and requires a fall protection plan to specify:

- The fall hazards at the workplace;
- The fall protection systems to be used;
- The anchors to be used;
- Confirmation that the clearance distances below the work area are sufficient to prevent a worker from hitting the ground or an object or level below the work area, if applicable;
- The procedures to be used to assemble, maintain, inspect, use and disassemble the fall protection systems; and
- The rescue procedures to be used if a worker falls and is suspended by a personal fall arrest system or safety net.

Generic v. Site-Specific Plans

Do you have to create a unique fall protection plan for each worksite with fall hazards or can you develop a generic plan to be used at all such worksites? The OHS laws don't address this issue. But government guidelines in AB, MB and PE do. For example, PE's *Guide to the Fall Protection Regulations* says that most fall protection plans must be specific to the site where fall protection is being used. However, guidelines in AB and MB indicate that site specific fall protection plans aren't required unless a particular site or structure is unique or poses unusual fall hazards. Alberta's *Explanation Guide to the OHS Code 2009* says that if an employer faces the same fall hazards at multiple worksites and the fall protection equipment and rescue procedures are identical at each site, then it can use a single plan for those sites. Alternately, an employer can create a single fall protection plan that covers all fall hazards likely to be encountered during normal operations.

Training Workers on Plans

As with all safe work procedures, employers must train workers on fall protection plans. The OHS laws specifically require employers to review fall protection plans with workers before work with a risk of falling begins at the site.

Availability of Plans at Site

A copy of the fall protection plan must be available at the worksite to which it applies. Again, the OHS laws require fall protection plans to be available onsite before work involving fall hazards begins.

Conclusion

Workers can fall from roofs, ladders and scaffolding. They can also fall into exposed openings, hatches and excavations. And too often these falls result in serious injuries or fatalities. By developing and implementing fall protection plans where appropriate, your company will be better prepared to protect workers from fall hazards and minimize the likelihood that they'll be seriously injured or worse if they should fall.