

High Visibility Apparel Compliance Game Plan



The presence of moving machinery and human beings at the same work site can be a deadly combination, especially when work takes place at night or under conditions of low visibility. Most struck-by, back over and vehicle collision incidents occur because the operator didn't see the victim. So, ensuring that workers have and use appropriate reflective and brightly coloured vests, bibs, coveralls and other high visibility (HV) apparel that makes them easier to see is crucial to preventing such incidents; it's also an essential requirement of OHS regulations. Here's a briefing on OHS HV apparel requirements and the 8 things you must do to comply with them.

Step 1. Perform Hazard Assessment

How important is it for workers at your site to be highly visible; what health and safety dangers do workers face if they or parts of their bodies are obscured from the view of others at or near the site? The starting point for compliance with HV apparel requirements is to assign a competent person to perform a hazard assessment to address these questions based on the nature and type of work to be performed at the site. HV apparel is generally necessary when the following risk factors are present:

- Workers must interact with or work near moving vehicles or mobile equipment;
- Those vehicles and equipment are moving at a high rate of speed;
- The sight lines of vehicle and equipment operators are generally poor, such as when mobile equipment is moving in reverse or in the face of visual obstructions;
- Workers act as traffic controllers or engage in other high-risk operations;
- Work is performed in darkness, fog, haze or other conditions of poor visibility;
- The lighting conditions at the site are uncertain and variable, e.g., outdoor work carried out in natural lighting that may be affected by changes in the weather;
- It's crucial that people at the site be able to see and distinguish workers at all times; and
- There are things that might distract the attention of workers and equipment

operators.

Compliance Note: The OHS laws make the furnishing and wearing of HV apparel mandatory in certain situations, including when workers:

- Are exposed to the danger of vehicles or moving equipment;
- Are designated to perform signaling, flagging or other traffic control functions; and/or
- Work in forestry, arboriculture or mining.

Step 2: Try to Engineer Away Hazards

Canada OHS laws follow the so-called hierarchy of controls approach to managing hazards, at the top of which is eliminating the hazard completely by eliminating the operation posing the hazard. The next tier is the use of engineering controls to reduce the hazard, such as by installing physical barriers that protect workers from making contact with moving vehicles and equipment. If substitution or engineering controls aren't reasonably practicable, employers must use administrative or work controls to manage the hazard. PPE like HV apparel is the safety measure of last resort.

Step 3: Furnish the Required HV Apparel

While you might think of it as personal clothing, HV apparel is generally considered a form of PPE that the employer is required to furnish to workers at its own expense. This is expressly spelled out in Alberta, New Brunswick, Prince Edward Island, Saskatchewan and the 3 territories. The employer duty to provide required HV apparel is less clear in the other jurisdictions. The one rule that's universal is that workers have a duty to use the HV apparel required, regardless of who provides it.

Step 4: Ensure HV Apparel Meets General CSA Design Standards

Employers must ensure that required HV apparel is properly designed and constructed. Five jurisdictions specify that HV apparel must meet some version of CSA Standard Z96, *High Visibility Safety Apparel*:

- BC, New Brunswick, Nova Scotia and Quebec: CSA Z96-2015; and
- Manitoba: CSA Z96.02.

Although the other 9 jurisdictions don't refer to the CSA or any other standard, a case can be made that CSA Z96 represents a kind of best practice for HV apparel. Under the standard, such apparel must be fluorescent yellow-green, fluorescent orange-red, fluorescent red bright yellow-green or bright orange-red in colour and have stripes or bands that:

- Are at least 50 mm wide;
- Have a waist-level horizontal stripe or band that goes completely around the body at the navel or belly button;
- Have 2 vertical stripes on the front passing over the shoulders and down to the waist; and
- A symmetric "X" extending from the shoulders to the waist in the back.

Step 5: Ensure HV Apparel Is of the Right Class

CSA Z96 lists 3 classes of garments based on how much of the body they cover. Each class covers the torso (waist to neck) and limbs according to the minimum body coverage areas specified for each class.

Class 1 HV Apparel

Class 1 provides for good visibility with the lowest recognized coverage and should be used for low-risk situations such as where:

- Workers can pay full and undivided attention to approaching traffic;
- The worker on foot is amply separated from the traffic;
- Work backgrounds aren't complex and allow for optimal visibility;
- Vehicles are moving slowly, e.g., less than 40 km/h (25 mph); or
- Workers are doing tasks that divert attention from approaching traffic.

Examples of low-risk jobs include directing vehicle operators to parking or service locations, retrieving shopping carts in parking areas and carrying out warehouse operations.

Class 2 HV Apparel

Class 2 apparel is required for medium-risk situations such as where:

- Vehicles or equipment are moving between 40-80 km/h (25-50 mph);
- Workers require greater visibility under inclement weather conditions or low light;
- Work backgrounds are complex;
- Workers are performing tasks that divert attention from approaching vehicle traffic; or
- Work activities are in closer proximity to vehicles in or near flowing vehicle traffic.

Examples of medium-risk jobs include roadway construction, utility, forestry, railway and utility work, as well as law enforcement, emergency response and airport baggage handling and ground crew operations.

Class 3 HV Apparel

Class 3 apparel is required for high-risk situations done in low light such as where:

- Vehicles or equipment are moving faster than 80 km/h (50 mph);
- Workers on foot and vehicle operators have high task loads that clearly place the worker in danger;
- The wearer must be conspicuous through the full range of body motions at a minimum of 390 m (1,280 ft); or
- Work activities take place in low light or at nighttime.

Examples of high-risk jobs include roadway construction, utility work and emergency response in low light conditions, road assistance, courtesy patrols, flagging and towing operations.

Step 6: Ensure HV Apparel Properly Fits the Worker

As with any other form of PPE and protective clothing, the right fit is essential to the effectiveness of HV apparel. The garment should be comfortable, sit correctly on the body and stay in place during the work, allowing the user to perform the function requiring the apparel as intended. Fit must also account for whatever clothing workers wear under the HV garment. It should be of appropriate weight and provide ample flexibility and stretch. Last but not least, caution workers not to wear other clothing or equipment that covers their HV apparel.

Step 7. Ensure Proper Maintenance & Cleaning of HV Apparel

HV apparel won't work properly if it gets too dirty, corroded or damaged. Instruct workers to inspect their HV apparel before and after each use to ensure it's bright and visible and free of things that may undermine its effectiveness, such as small holes, fading materials and fraying. Follow the manufacturer's instructions for cleaning and replacing the particular garment when necessary.

Step 8: Train Workers in Proper HV Apparel Use

Every worker required to wear HV apparel should receive training and instruction from a supervisor or other qualified person before first use. Key things workers need to know include:

- Why and when to use the apparel;
- How to put it on, take it off and ensure it fits properly;
- Any limitations in the protection the apparel provides;
- How to properly use, maintain, clean, decontaminate, inspect and store the apparel; and
- How to carry out the applicable safe work procedures for operations requiring use of the apparel.

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.