

Managing Fatigue and Overtime Risks: How Canadian OHS Managers Can Strengthen Their Fatigue Risk Management Systems (FRMS)



Fatigue isn't just about feeling tired at work—it's a hidden hazard that can quickly escalate into serious incidents and injuries. If you're an Occupational Health and Safety (OHS) manager in Canada, you already know fatigue can seriously affect worker safety and organizational productivity. But do you truly understand how overtime hours amplify fatigue hazards in your workplace?

Let's dig into why [fatigue](#) and overtime should never be overlooked, how they influence workplace safety, and most importantly, what you can do about it. We'll also clarify how fatigue and overtime policies differ across Canadian jurisdictions, so you know exactly how to align your Fatigue Risk Management Systems (FRMS) with regulatory expectations.

Why Fatigue Matters: Understanding The Risks

Fatigue is much more than just feeling sleepy or needing another coffee break. It's about being physically and mentally

worn down, impairing decision-making, reaction times, and situational awareness. Simply put, fatigue can be just as dangerous as operating machinery while impaired by alcohol.

Research shows a clear link between fatigue and workplace incidents, especially in safety-sensitive industries like transportation, healthcare, manufacturing, mining, and construction. When workers are fatigued, they're more likely to make errors, overlook hazards, and get injured. But here's the catch—one of the leading contributors to workplace fatigue is something we often consider normal: [overtime](#).

Overtime's Hidden Dangers: When Extra Hours Become Hazardous

Overtime might seem harmless—just an extra hour here and there—but those hours quickly accumulate. Workers putting in long shifts or multiple consecutive days without proper rest aren't just less productive; they're at significantly higher risk of incidents and injuries.

In fact, studies suggest that working more than 50 hours per week sharply increases injury rates, with the risk jumping dramatically after consecutive days of overtime. When your employees regularly pull extra shifts, the incremental fatigue doesn't vanish after a good night's sleep—it builds, leaving your workplace vulnerable to accidents, lost productivity, and liability issues.

This isn't theoretical. Real-world data consistently shows that tired employees are less alert, more prone to errors, and slower to respond to emergencies. The result? Increased workplace accidents, higher insurance costs, and negative impacts on morale and mental health.

The Role of Overtime in Fatigue Risk Management Systems (FRMS)

So, where does overtime fit into your Fatigue Risk Management System (FRMS)? FRMS aren't just another safety policy—they are a comprehensive framework designed to identify, assess, and manage fatigue hazards proactively. And in any effective FRMS, overtime management plays a central role.

Effective FRMSs are proactive. They don't simply react to incidents after they occur—they prevent them by carefully evaluating when and how overtime is assigned. If your FRMS doesn't consider overtime, it's incomplete. But what should Canadian OHS managers specifically look out for?

When evaluating fatigue risks related to overtime, consider these critical questions:

- How frequently are employees working overtime?
- Are certain workers or teams consistently working longer hours?
- Are employees getting adequate rest periods between shifts?
- Does overtime spike during certain seasons or workloads?

If your answers suggest significant overtime use, it's a red flag. Your FRMS must address these risks directly—through proactive scheduling, careful monitoring, and strong oversight.

Addressing Overtime Risks: Practical Steps for OHS Managers

You understand the problem, but what can you actually do about it? Here are proven strategies for managing overtime-related fatigue in your workplace.

First, monitor and limit overtime. Instead of relying on unlimited overtime as a catch-all solution, build sustainable staffing practices. Monitor work hours closely and ensure employees receive appropriate breaks between shifts.

Second, foster transparency and [communication](#). Make employees aware of fatigue risks associated with overtime. Encourage open dialogue—workers should feel comfortable reporting fatigue without fear of reprimand or losing income.

Third, regularly analyze overtime patterns. If certain employees or teams consistently rack up overtime, investigate why. Is staffing insufficient? Are workloads unrealistic? Identifying root causes is essential to solving the overtime-fatigue dilemma.

Fourth, provide fatigue education and awareness training. Employees need to recognize fatigue symptoms and understand their impacts on safety. Training ensures everyone knows the signs of fatigue—and how serious they can be.

Finally, actively manage shift scheduling. Prioritize adequate rest periods. Shift scheduling tools and software can help you monitor hours effectively and ensure shifts align with best practice guidelines.

Understanding Regulatory Requirements Across Canada

Fatigue management regulations vary significantly across Canada. While there's no universal federal standard specifically targeting fatigue, the general "duty of care" under occupational health and safety legislation applies nationally, meaning employers must manage fatigue as a recognized hazard.

However, provinces have different regulations regarding maximum working hours, overtime limits, and mandatory rest

periods. Here's a helpful breakdown:

Jurisdiction	Regulatory Highlights Regarding Fatigue and Overtime
Federal	Employers must manage known hazards under Canada Labour Code; limited specific fatigue rules.
British Columbia	Overtime after 8 hours/day or 40 hours/week. Employers must ensure fatigue is addressed as a hazard.
Alberta	General duty to control known hazards. Overtime after 8 hours/day or 44 hours/week.
Ontario	Overtime after 44 hours/week; general duty to prevent known hazards, including fatigue.
Québec	Overtime after 40 hours/week; fatigue management covered under general prevention obligations.
Manitoba	Overtime after 8 hours/day or 40 hours/week; employers must ensure workers aren't exposed to undue fatigue.
Saskatchewan	Overtime after 8 hours/day or 40 hours/week; general duty includes fatigue hazard management.
Atlantic Provinces (NS, NB, NL, PEI)	Typically overtime after 48 hours/week; specific fatigue management practices not mandated but strongly advised.
Territories (NT, YT, NU)	Overtime after 8 hours/day or 40 hours/week; employers responsible for managing fatigue hazards under general safety obligations.

Understanding these jurisdictional differences is critical. Your fatigue management policies must align with both

provincial and federal expectations.

The Importance of Addressing Fatigue Proactively

Ignoring fatigue hazards—especially those intensified by overtime—is a costly gamble. Consider the potential consequences: increased incidents and injuries, reduced productivity, higher turnover, and significant liability and legal risks. No company wants to be known as the workplace where “everyone’s exhausted” or where safety suffers because of poor overtime management.

On the flip side, proactively managing fatigue leads to healthier, more productive workers, fewer incidents, and improved morale. A strong FRMS enhances your organization’s safety culture, demonstrating to workers that their well-being is a genuine priority.

Conclusion: Why Overtime Management Should be Central to Your FRMS

Fatigue-related hazards aren’t new, but our understanding of how overtime exacerbates these risks has evolved significantly. As Canadian OHS managers, you have the power to prevent fatigue-related incidents through careful overtime management, proactive monitoring, and clear communication.

Fatigue management is no longer a nice-to-have—it’s essential. When overtime becomes the norm rather than the exception, fatigue isn’t far behind, putting your people and your business at risk. By embedding overtime control measures within your FRMS, you strengthen safety, enhance productivity, and safeguard your organization’s reputation.

Remember, fatigue can be deadly—but it’s entirely preventable.

The question now isn't whether you can afford to manage fatigue; it's whether you can afford not to.

Additional Resources for OHS Managers

- [Canadian Centre for Occupational Health and Safety \(CCOHS\) – Fatigue](#)
- [Canada Labour Code – Hours of Work](#)
- [WorkSafeBC – Managing Fatigue at Work](#)
- [Alberta OHS – Fatigue Risk Management](#)
- [Ontario Ministry of Labour – Fatigue and the Workplace](#)