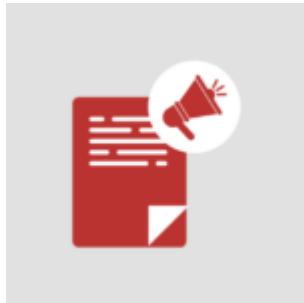


Québec's Act to Modernize Occupational Health and Safety and What It Means for Employers



Québec's occupational health and safety landscape has fundamentally changed. What was once described as a transition or modernization effort is now a permanent, enforceable regime with real expectations and real consequences for employers. The Act to modernize occupational health and safety, often referred to as Bill 27, is no longer something employers can treat as emerging or forthcoming. As of late 2025, the new framework is in force and the CNESST expects workplaces to be operating within it.

For employers, the challenge is no longer understanding what is coming. The challenge is understanding what must already be in place, how the new regime applies to their specific operations, and where hidden compliance gaps may exist. This is particularly true for organizations with smaller presences in Quebec or employees who work in the province on a contract or project basis.

This article explains what the modernized regime actually requires, what has changed in practical terms, when the key obligations took effect, and what employers must do now to remain compliant.

Why Québec Overhauled Its OHS System

Québec's occupational health and safety framework was built decades ago around a prevention model that focused primarily on traditional industrial hazards. Over time, that model became unevenly applied. High risk sectors had robust prevention requirements, while large portions of the economy operated with minimal formal obligations.

At the same time, work itself changed. Service sectors expanded. Professional and administrative environments grew. Psychosocial risks such as workload, harassment, and work organization became more prominent contributors to injury and illness. The old framework struggled to capture those realities.

The Act to modernize occupational health and safety was Quebec's response to that gap. Its purpose is straightforward. Prevention must apply across the economy, not just in visibly dangerous workplaces. Worker participation must be meaningful, not symbolic. Employer accountability must be proactive rather than reactive.

The result is not a single new requirement, but a restructured system that expects prevention to be built into day-to-day operations.

The Most Important Shift Employers Need to Understand

The most significant change under the modernized regime is that prevention is no longer optional or informal, regardless of sector. Employers that previously relied on general policies, basic training, or incident response are now expected to demonstrate structured prevention planning.

This does not mean every workplace must have the same level of complexity. The law recognizes differences in size and risk. What it does mean is that every employer covered by Quebec jurisdiction must be able to show that hazards are identified, risks are analyzed, and corrective measures are implemented and followed up.

That expectation now applies broadly across workplaces, including offices, professional services, retail, logistics, and mixed environments.

Prevention Programs and Action Plans Are Now Mandatory

Under the permanent regime, employers must implement either a prevention program or a prevention action plan, depending on the size of the establishment and the nature of the activities performed.

A prevention program is the more comprehensive framework. It requires employers to systematically identify hazards, evaluate risks, select control measures, and monitor their effectiveness. It is not a static document. It must be reviewed and updated to reflect changes in work, organization, and risk.

For smaller workplaces, a prevention action plan fulfills a similar function at a scaled level. It still requires hazard identification and corrective actions, but in a format intended to be more accessible. The key point for employers is that smaller does not mean exempt. Documentation and follow through are still required.

Importantly, the modernized regime explicitly includes psychosocial risks within the scope of prevention. Employers must consider factors such as harassment, violence, excessive workload, and work organization alongside physical,

chemical, and ergonomic hazards. Treating these risks as HR issues rather than OHS issues is no longer defensible.

Worker Participation Is Central to Compliance

Another defining feature of the modernized regime is the expansion and formalization of worker participation mechanisms. Health and safety committees, health and safety representatives, and liaison roles now apply to a broader range of workplaces than under the old system.

These mechanisms are not meant to exist on paper only. They are expected to play an active role in prevention planning, hazard identification, and follow up. Employers must provide committee members and representatives with access to information, time to perform their functions, and appropriate training.

From a compliance perspective, the existence of a committee or representative is not enough. Inspectors and adjudicators will look at whether these mechanisms actually function and whether worker input influences prevention decisions.

Training and Competence Expectations Have Increased

While the Act does not prescribe a single universal training course, it raises expectations around competence. Supervisors, committee members, and health and safety representatives must understand their roles, the hazards present, and the prevention measures in place.

For employers, this often means moving beyond generic awareness training toward role specific education. Supervisors in particular are a focal point. They are

responsible for applying restrictions, implementing preventive measures, and responding to hazards in real time. A lack of supervisor competence is one of the most common weaknesses identified during inspections.

Enforcement Is No Longer Transitional

One of the most important clarifications from recent legal commentary is that the phase in period is over. As of fall 2025, Québec is operating under the permanent regime.

This has practical consequences. Inspectors are no longer approaching compliance as a future goal. They are assessing whether prevention programs, action plans, and participation mechanisms are already in place and functioning. Administrative monetary penalties and orders are available where employers fall short.

For employers that delayed implementation, the risk is not theoretical. The enforcement posture has shifted from guidance to expectation.

What Employers Must Do to Comply Now

Compliance begins with understanding whether Québec OHS law applies to your operations. If employees perform work in Québec, even temporarily, the regime generally applies to that work.

Once jurisdiction is established, employers must determine which prevention structure is required and whether existing practices meet current expectations. This often reveals gaps. Informal hazard identification, undocumented corrective actions, and inconsistent worker

involvement are common findings.

Employers should review their prevention documentation, ensure psychosocial risks are addressed, confirm that participation mechanisms are in place and functional, and verify that supervisors and representatives are trained for their roles.

Leadership involvement is critical. Under the modernized regime, accountability sits squarely with the employer. Health and safety cannot be delegated entirely to a coordinator or committee.

What About Employers with a Small Presence in Québec

Many organizations assume that a limited footprint in Québec reduces their obligations. In practice, that assumption is risky.

If an employer has employees working in Québec, Québec OHS law generally applies to those workers while they are performing work in the province. The scale of the prevention measures may vary, but the obligation to identify hazards and implement controls does not disappear.

This is particularly relevant for organizations with satellite offices, sales staff, technical personnel, or project-based work in Québec. Head office policies from another jurisdiction may not address Québec-specific requirements, particularly around prevention planning and worker participation.

Employees Based Elsewhere but Working in Québec

The same principle applies to employees who are based outside Québec but perform work there under a contract or assignment.

In most cases, Québec law governs the working conditions while the work is performed in the province.

Employers must therefore be prepared to align their prevention measures with Québec's framework for those activities. A national or multi provincial approach to OHS is helpful, but it must be flexible enough to account for Québec's specific expectations.

Why This Matters Beyond Quebec

Québec's modernized regime reflects a broader national trend toward proactive prevention and worker involvement. While Quebec has moved further and faster than most jurisdictions, other provinces are watching closely.

Employers that align their systems with Québec's expectations are often better positioned to adapt as other jurisdictions strengthen their own frameworks. Those that resist or delay may find themselves reacting to change rather than managing it.

The Bottom Line for Employers

The Act to modernize occupational health and safety is no longer about preparation. It is about execution.

Employers must be able to demonstrate that prevention is embedded in their operations, that workers have a voice in health and safety, and that risks, including psychosocial risks, are identified and managed. Size and sector influence how these obligations are met, but they do not eliminate them.

For organizations operating in or touching Québec, this is the new baseline. Treating the modernized regime as a compliance project to be deferred is no longer viable. Treating it as an opportunity to strengthen prevention and resilience is far

more effective, both legally and operationally.

Updated Key Dates for Bill 27 and the Modernized OHS Regime in Québec

October 6, 2021

This is the date Québec's National Assembly adopted and the Lieutenant Governor assented to the Act to modernize the occupational health and safety regime (Bill 59, also referred to as Bill 27 in practice). The reform began its multi-year phase in from this point. ([Publications du Québec](#))

April 6, 2022

An early phase of the modernized regime came into force around this date, initiating interim prevention and participation mechanisms that increased workplace responsibility for health and safety. These interim obligations applied while the full regulatory framework was being developed and phased in toward 2025. ([Lapointe Rosenstein Marchand Melançon](#))

January 1, 2023 (Construction-Specific Rules)

Separate interim prevention rules specific to construction sites began applying, although these are distinct from the broad regime changes that affected all employers. ([BLG](#))

October 1, 2025

This is the major milestone date. On October 1, 2025, Order in Council 1154-2025 brought many permanent provisions of the modernized Act fully into force, as originally planned and confirmed despite earlier suggestions of delay. ([BLG](#))

On this date:

- The old regulations respecting safety representatives and health and safety committees were repealed and replaced with a new Regulation respecting prevention and participation mechanisms in an establishment. ([BLG](#))

October 6, 2025

This date is explicitly referenced in several legal commentaries as the end point of the multi-year phase-in for Bill 27 obligations. By this date:

- Employers were *required to integrate psychosocial risk identification, analysis, documentation, and prevention into their prevention programs or action plans.* ([Raymond Chabot Grant Thornton](#))

This reflects the transformation from incident-based safety toward a risk-based prevention model that includes physical, biological, ergonomic, and psychosocial risks. ([Raymond Chabot Grant Thornton](#))

Ongoing and Phased Requirements After October 2025

Some obligations extend beyond the October timeline in terms of compliance commitments and regulatory expectations, including:

- Annual review and updating of prevention programs or action plans.
- Worker participation mechanisms operating fully under the new regulatory regime.
- CNESST training requirements for health and safety committee members and representatives

Collectively these are expected to be fully operational from late 2025 onward with enforcement attention continuing into 2026 and beyond. ([Fasken](#))

What These Dates Mean in Practice

This updated timeline shows that Bill 27 is *not* a law that stretches years into some vague future. Effective October 2025, the core obligations are now part of Québec OHS law. Employers must be compliant now. The phase-in timeline that began in 2021 was always meant to culminate in this structural

shift, and the government confirmed that most of the major obligations took effect this fall. ([BLG](#))

That means by October 2025:

- Employers with 20 or more workers must have implemented a documented prevention program. ([DLA Piper GENIE](#))
- Employers with fewer than 20 workers must have implemented a formal health and safety action plan that includes risk identification, hazard mitigation priorities, and follow-up. ([DLA Piper GENIE](#))
- Worker participation mechanisms through committees, representatives, or liaison officers are expected to be functioning. ([DLA Piper GENIE](#))
- Psychosocial risks must be included in the hazard identification and prevention process alongside physical and ergonomic risks. ([Raymond Chabot Grant Thornton](#))

Why This Matters for Employers

The revised dates reinforce that October 2025 was not simply an optional compliance target. It was widely communicated by legal and regulatory commentators as the deadline for full compliance with the modernized regime. Employers should not assume obligations are still future obligations. The CNESST can and will assess compliance against this framework going forward because the core regime is in force. ([BLG](#))