

# Why First Aid Kits No Longer Cut It Understanding the New Federal First-Aid Requirements Under the Canada Labour Code



For years, many federally regulated employers treated first-aid kits as a simple box to check. You bought the kits, placed them on the wall, stocked the bandages, filled out the inspection card once a month, and you felt reasonably confident you were meeting your duty of care. If something happened, you could point to the kit and say you had complied.

That world is changing. Quietly but significantly.

The federal government is preparing amendments to Part XIII of the Canada Labour Code and the related Canada Occupational Health and Safety Regulations, and these changes shift first-aid from a compliance item to a genuinely proactive readiness requirement. The amendments acknowledge something OHS managers have known for years. First-aid is not about the kit. It is about the capability behind the kit. It is about response time. It is about confidence. It is about training. It is about an employer's ability to prevent a manageable injury from becoming a catastrophic one.

And for federally regulated workplaces across Canada, these

changes are coming at a time when hazards are evolving quickly.

Remote and hybrid work. Isolated workers. Aging employees. Mental health emergencies. Extreme weather. Increased public aggression. Higher injury severity in transportation and warehousing. More complex work environments. Every one of these shifts has highlighted a painful truth. A first-aid kit on the wall is not enough.

This article breaks down why the new amendments matter, what they are responding to, and how OHS managers can prepare their organizations before the new rules take effect.

## **A Wake-Up Call Hidden in the Data**

Over the last decade, federally regulated sectors have seen a steady rise in injury severity. Transportation and warehousing, telecommunications, postal services, banking and finance, and federal public service all show similar trends. The number of total injuries has not exploded, but the seriousness of many injuries has.

Transport Canada has reported a jump in incidents categorized as “severe or potentially severe.” The Canadian Centre for Occupational Health and Safety noted that response time in isolated or remote work situations is one of the top predictors of injury outcome. And the Public Health Agency of Canada found that close to one in five workplaces now experiences a medical event that is not trauma related but still requires urgent care, such as cardiac distress or mental health crises.

Even more concerning are findings from Employment and Social Development Canada. In a review of federal workplaces, they discovered that in over 40 percent of random inspections, at least one element of required first-aid compliance was missing. In some workplaces, the kits were expired. In others,

staff were unsure who the trained first-aiders were. In one incident, a worker experiencing an anaphylactic reaction had access to a kit but no trained responder to administer the EpiPen he carried.

He survived because another employee had taken a community first-aid class on their own and recognised the signs of airway obstruction.

These numbers are not just statistics. They are signals. They are pointing to a gap that the amendments are trying to close.

## **Three Stories That Explain Exactly Why the Rules Are Changing**

### **The case of the delayed response**

A federally regulated logistics company in Ontario experienced a crushing injury when a worker's hand was caught in a palletizing machine. The kit was fully stocked, but the nearest trained first-aider was working in another building. By the time help arrived, the bleeding had increased significantly, and the worker suffered permanent nerve damage. During the investigation, the employer insisted they had complied with the kit requirements. The regulator disagreed. They had not ensured adequate access to trained responders. The kit did not matter because the capability behind it was missing.

### **The story of the lone worker**

A telecommunications technician in Nova Scotia was working alone in a rural area when he fell from a small height and injured his ankle. He had a kit in his truck, but he could not reach it easily and his phone battery had died. It took hours for help to arrive. The worker developed complications that

extended his recovery by months. The case highlighted something the amendments now address. First aid for isolated workers must consider communication tools, location tracking, response planning, and realistic timelines.

## **The emotional aftermath no one anticipated**

In a federal office in Ottawa, an employee suffered a sudden cardiac arrest. Three colleagues performed CPR while another retrieved the AED. They saved his life. Months later, the workers who assisted reported significant emotional distress. They had not been trained for the psychological side of emergency response. They were proud they acted, but they felt alone afterwards. The amendments now speak to post-incident support, because first aid is not only about the injured person. It is also about the responders.

Every one of these cases demonstrates the same lesson. Compliance is not readiness. Kits do not save lives. People do.

## **What the New Amendments Mean in Practical Terms**

Although the federal updates are still being finalized, the direction is clear. The focus is shifting to:

- Improved training requirements.
- Greater emphasis on response capability.
- Better planning for isolated and remote workers.
- Stronger record keeping and documentation.
- Updated equipment standards.
- Clearer expectations around AEDs and modern tools.
- Post-incident psychological support.
- Ensuring adequate coverage across shifts, floors, and workplaces.

The language of the amendments leans toward real preparedness. That is a meaningful change. The federal government is sending a message that first aid is part of a living safety system, not a resting kit on a shelf.

Regulators are also becoming more interested in the concept of proximity. Who can respond? How quickly? With what level of skill? On what floor? In what building? On which shift? In which vehicle? For which tasks?

This is why OHS managers can expect more scrutiny around things like emergency drills, response mapping, and the practical accessibility of equipment.

## **Why This Matters More Than Most Employers Realize**

One of the biggest risks in federally regulated environments is false confidence. Many employers feel they are prepared because they have kit compliance. They pass inspections. They have names posted. They hold one training session a year.

But emergencies do not wait for perfect scenarios. They happen in the middle of a snowstorm or during a night shift when the only trained first-aider is on vacation. They happen when someone panics or freezes or misinterprets symptoms. They happen to lone workers who have equipment but no communication. They happen during moments of fatigue.

A safety director for a rail company once said, "We had six kits and fifteen trained responders, but none of that mattered when the real event happened. It happened exactly where we had a blind spot we didn't even know existed."

The new amendments push employers to identify those blind spots before they become tragedies.

# The First-Aid Landscape Has Changed

Workers today are not only dealing with cuts, sprains, and mechanical injuries. They are dealing with:

- Opioid overdoses.
- Mental health crises.
- Heat stress due to climate change.
- Extreme weather events.
- Cardiac events in aging workforces.
- Violence and public aggression.
- Complex injuries in high-risk transport environments.
- Communication delays for isolated roles.

These realities demand a first-aid program that evolves with modern hazards. The law is catching up. The upcoming amendments reflect this shift.

## What OHS Managers Should Start Doing Now

Even before the amendments are fully implemented, there are steps federally regulated employers can take to stay ahead. The most important is to treat first aid as a capability, not an inventory item.

OHS managers can begin by mapping where their trained responders physically are at any moment. They can identify gaps in shift coverage and geographic coverage. They can talk to supervisors about real-world