

Compliance Pulse Check

Ontario Mining Sector
Compliance Resource

Based on compliance findings from:
April 1 to June 30, 2025

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About this resource

The Workplace Safety North Compliance Pulse Check resource summarizes the most common Ministry of Labour, Immigration, Training and Skills Development (MLITSD) findings (orders and requirements) in Ontario's mining sector for a set period. The most recent data is used to provide quarterly compliance guidance and tools to drive action by focusing efforts on the highest-risk areas that were discovered throughout the sector.

This information has been prepared to assist workplace parties in understanding their rights and duties under the Occupational Health and Safety Act (OHSA) and its regulations, including Regulation 854: Mines and Mining Plants (Reg. 854). This information is not exhaustive and does not constitute legal advice. To determine your rights and duties under OHSA, please contact your legal counsel or refer to the legislation.

Using this resource

This guide provides an overview of the top hazard areas and themes from the most recent quarter. Symbols throughout the guide indicate additional resources, links, or other information that may assist workplace parties in understanding the hazards and controls available.



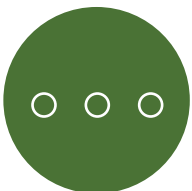
Calls to Action

Provide insight on what good *could* look like.



Supporting Tools

Tools to support compliance verification.



Hazard References

Icons reflective of the associated hazards.

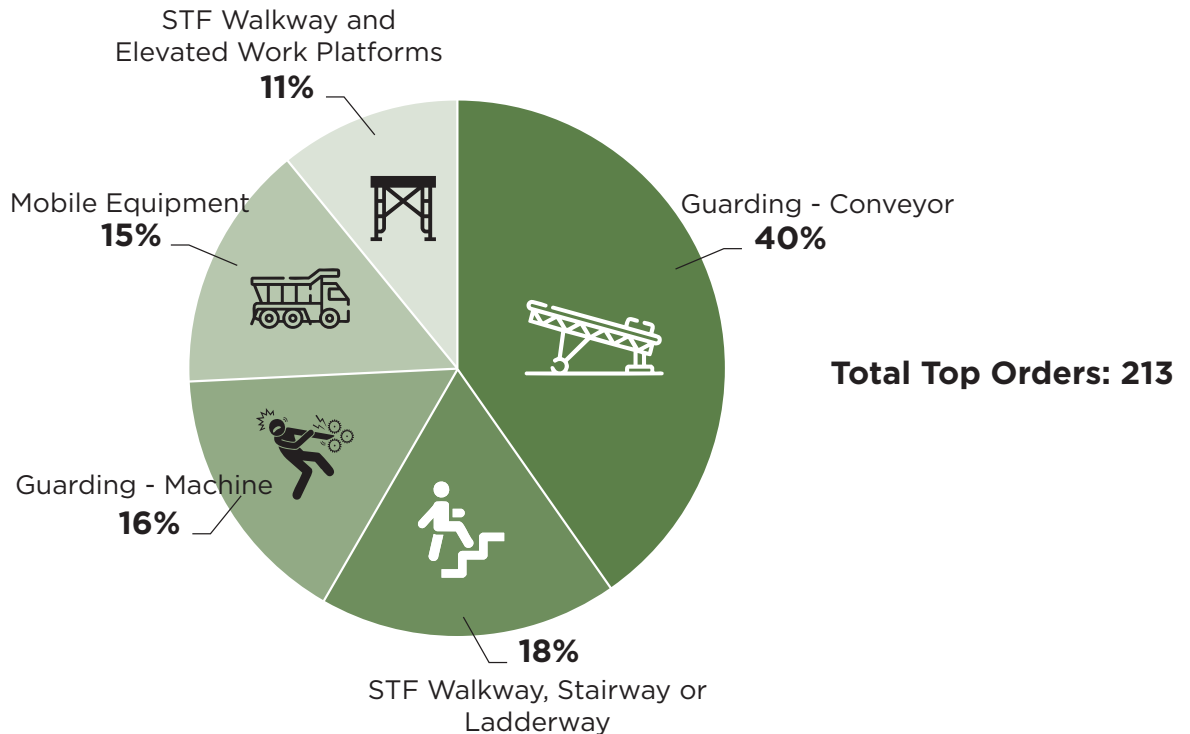


Helpful Links

Websites that may provide additional insight.

Top Orders and Requirements (Reg. 854)

April 1 to June 30, 2025



Hazard 1: Guarding Conveyors

Legislative Requirement: Mechanical – Reg. 854, s. 196 (3.1)

*Pinch points referred to in s. 196(3) shall be **guarded by a guard** that, unless it would render the pinch point inaccessible, **extends at least 0.9 m from the pinch point.** (O. Reg. 167/16, s. 12(1))*

Common gaps

- Short “flap” guards that don’t reach 0.9 m.
- Missing guards at return rollers near walkways.
- No documented verification after maintenance.
- Appropriate training for workers.



Hazard 2: Slip, Trip and Fall – Walkways, Stairways and Ladderways

Legislative Requirement: Access to Workplaces – Reg. 854, s. 54(1),(2)

*Walkways/stairways/ladderways shall **be maintained in a safe condition, free from obstructions, sized to prevent crowding, and cleared of hazardous accumulations without undue delay.***

*Openings in floors/surfaces that may be a hazard must be **guard-railed** or **securely covered** (capable of the load). (R.R.O. 1990, Reg. 854, s. 54)*

Common gaps

- “Temporary” plywood covers not fastened/graded.
- Hoses/cables across aisles; buildup on treads.
- Blocked walkways and improper housekeeping impacting working surfaces.





Hazard 3: Machine Guarding

Legislative Requirement: Mechanical – Reg. 854, s. 185(2)

*A machine with an exposed moving part that may endanger any person **shall be fenced or guarded**, unless its position/construction/attachment provides **equivalent protection**.* (O. Reg. 31/04, s. 10)

Common gaps

- Removable guards for quick fix/clear jams without interlocks.
- No documentation supporting “equivalent protection.”



Hazard 4: Mobile Equipment

Legislative Requirement: Haulage – Reg. 854, s. 105(1)

*When in use, a motor vehicle (not on rails) shall be **in safe working condition; brakes stop/hold under full load on grades; head/tail lights** (with noted exceptions); **fail-safe steering** on surface if power-assist fails; **competent operator**; operator fixed seat where practical; proper control position; safe remote/automated fail-stop; secured when unattended; width lights/reflectors (surface); **reverse with spotter if risk; type BC fire extinguisher**.* (R.R.O. 1990, s. 105(1); O. Reg. 31/04; O. Reg. 84/07)

Common gaps

- No documented grade/hold test; missing extinguishers or expired tags.
- “Temporary” operators without competency sign-off.



Hazard 5: Slip, Trip and Fall – Walkways and Working Platforms

Legislative Requirement: Access to Workplaces – Reg. 854, s. 46(3)

Every walkway and every working platform more than **1.5 metres above the ground shall be provided with,**

- a handrail not less than 0.91 metre or more than 1.07 metres above the floor of the walkway or platform;
- a second rail placed at the mid-point between the top rail and the floor of the walkway or platform or have the space between the top rail and the floor closed by a screen; and
- toeboards which shall extend from the floor a height of not less than 100 millimetres. R.R.O. 1990, Reg. 854, s. 46 (3).

Common gaps

- Toe-boards missing at platforms with material handling.
- Rail heights below 0.91 m due to deck resurfacing.





Call to Action & Supporting Tools

This section contains insight and supporting tools (verification checklists) that can be used during inspections for each of the top hazards identified during compliance initiatives. Use each checklist to help determine your current degree of compliance with legal requirements to ensure the health and safety your workforce.

Note: These checklists are tools to **support** compliance verification.

Employers are responsible for ensuring full compliance with the Occupational Health and Safety Act and O. Reg. 854.



Conveyor Guarding

What Good Could Look Like

- Fixed (not makeshift) guards installed at all in-running nips/pinch points on belts, tail/head pulleys, snub/idler rollers, take-ups.
- Guard **length** $\geq 0.9 \text{ m}$ along the approach to the pinch point (unless the pinch point is already inaccessible).
- Guards secured with tool-required fasteners; interlocks where frequent access is required.
- Safe work procedure for inspection/cleaning (no hands/tools near running belts).

Key Compliance Actions

Verify Hazard Controls

- Measure guard extension; Test: “Does it move?”, “Can I touch it?”, “Can it hurt me?” test (no reach path to nip).
- Verify no removed/bypassed guards after maintenance.
- Check line-of-fire and pull-cord e-stops at access points.
- Verify LOTO points, training workers in relevant procedures and processes.
- Train workers in applicable SOPs including those associated with maintenance and cleaning.
- Supervise workers and ensure proper supervisor training.

Prove it!

- Guarding inventory with photos, measurements, and risk ranking.
- Supervisor field inspections and observation of safe work practices.
- Pre-shift conveyor inspection checklist; corrective work orders and close-out.
- LOTO and other appropriate training/records.
- SOP for working around conveyors and belt tracking/cleaning.

Helpful Resources



Conveyor Guarding in Mines – MLITSD Guideline

Guidance published by the MLITSD to assist in complying with legal requirements for guarding conveyors in mining.



Lockout and Guarding Resources – Workplace Safety North

Several resources developed by industry experts to assist organizations in understanding conveyor hazards and determining appropriate controls.

Conveyor Guarding Compliance Verification Checklist (Reg. 854 Section 196 for Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces assess compliance with conveyor guarding requirements under Section 196 of Reg. 854 (Mines and Mining Plants). Supervisors and joint health and safety committees can use this tool to verify guarding, documentation, and safe work practices are in place.

Inspection Item		Requirement (O.Reg.854)	Compliant (Yes/No)	Notes/Corrective Actions
1	All conveyor pinch points are guarded with a fixed guard extending at least 0.9 m from the pinch point.	s.196(3.1) – Guarding of pinch points		
2	Guards are securely fastened and not easily removed without tools.	s.196(3) – Guard must prevent access to moving parts		
3	Where guards cannot be used, the pinch point is otherwise rendered inaccessible.	s.196(3.2) – Exemption if point is inaccessible		
4	Pull-cord emergency stop devices are installed and tested at accessible locations along conveyors.	s.196(4) – Emergency stopping devices required		
5	Guards are in place after maintenance or cleaning (not bypassed or left off).	General duty – Safe condition maintained		
6	Safe work procedures (LOTO) are in place for inspection, cleaning, or maintenance near conveyors.	OHSA s.25(2)(h) – Take every precaution reasonable		
7	Workers have been trained and instructed in conveyor hazards, guarding, and emergency stop use.	OHSA s.25(2)(a) – Provide instruction to workers		



Walkway, Stairway and Ladderway

What Good Could Look Like

- 3-point contact access routes.
- Clean walking and working surfaces that allow for proper balance, traction or grip.
- Floor openings either guard-railed or covered and fastened; covers labelled with safe load.
- Aisle widths sized for traffic and work (people + tools/materials) while respecting fire code requirements for means of egress.

Key Compliance Actions

Verify Hazard Controls

- Establish and enforce housekeeping standards.
- Walk every access at shift start; remove trip hazards; verify anti-slip treads.
- Try to lift any cover — if it moves, it's non-compliant.
- Check lighting and hand clearance at ladders.
- Train workers in proper housekeeping, hazard and defect equipment reporting.
- Supervise workers and ensure proper supervisor training.

Prove it!

- Housekeeping routes and response times; winter plan.
- Inspections with photos and timestamps; work orders for repairs or maintenance.
- SOPs and training records for maintaining safe walking and working surfaces and creating/removing floor openings.

Helpful Resources



Preventing Slips, Trips, and Falls in the Workplace – MLITSD Guidance

Guidance published by the MLITSD to assist organizations in minimizing risk and preventing slips, trips and falls.



Fall Prevention Resources – Workplace Safety North

Several resources developed by industry experts to assist organizations in understanding fall hazards and determining appropriate controls.

Walkway, Stairway, and Ladderway Compliance Verification Checklist (Reg. 854 – Section 54, Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces verify compliance with walkway, stairway, and ladderway requirements under Section 54 of Reg. 854 (Mines and Mining Plants). Supervisors, safety representatives, and joint health and safety committees can use this tool to identify hazards and document corrective actions.

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
1	Walkways, stairways, and ladderways are maintained in a safe condition.	s.54(1)(a) – Must be maintained in a safe condition		
2	All access ways are free from obstructions and tripping hazards.	s.54(1)(b) – Must be free from obstructions		
3	Access ways are of sufficient size to prevent crowding during normal use.	s.54(1)(c) – Must be of sufficient size to ensure no crowding		
4	Hazardous accumulations of material (ice, water, muck, slurry, etc.) are cleared without undue delay.	s.54(1)(d) – Must be cleared of hazardous accumulations		
5	Any floor or surface opening that may be a hazard to a worker is protected by a guardrail.	s.54(2)(a) – Openings must have guardrail protection		
6	Any floor or surface opening that may be a hazard is covered with securely fastened planks or material capable of supporting expected loads.	s.54(2)(b) – Openings must be securely covered		

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
7	Covers for openings are secured so they cannot be easily displaced and are clearly identified.	Best practice – Derived from s.54(2) requirements		
8	Workers using walkways, stairways, and ladderways are trained in safe access practices.	OHSA s.25(2)(a) – Provide instruction to workers		



Machine Guarding

What Good Could Look Like

- Physical guards or engineered safeguarding (fixed, interlocked, presence-sensing) on shears, presses, drill/mill spindles, crushers, mixers, agitators, fans.
- “Equivalent protection” documented via risk assessment and engineering sign-off.

Key Compliance Actions

Verify Hazard Controls

- Try to reach the hazard zone with a probe/hand — if yes, guard is inadequate.
- Interlocks stop motion **and** prevent restart on opening.
- Conduct pre-work inspections to ensure guards are not defective.
- Training workers in working safety around machinery and prime movers.
- Supervise workers and ensure proper supervisor training.

Prove it!

- CSA Z432 aligned risk assessments.
- Guarding design drawings, interlock validation, change log.
- Operator training, supervisor job safe observation and skills verification for operator, and JHSC inspection notes.
- Supervise workers and ensure proper supervisor training.

Helpful Resources



Conveyor Guarding in Mines – MLITSD Guideline

Guidance published by the MLITSD to assist in complying with legal requirements for guarding conveyors in mining.



Lockout and Guarding Resources – Workplace Safety North

Several resources developed by industry experts to assist organizations in understanding conveyor hazards and determining appropriate controls.

Machine Guarding Compliance Verification Checklist (Reg. 854 – Section 185, Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces verify compliance with machine guarding requirements under Section 185 of Reg. 854 (Mines and Mining Plants). Supervisors, safety representatives, and joint health and safety committees can use this tool to assess guarding and ensure safe operation of machinery.

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
1	All machines with exposed moving parts that may endanger a worker are fenced or guarded.	s.185(2) – Must be fenced or guarded unless equivalent protection provided		
2	Guards prevent worker contact with nip points, shear points, rotating parts, and other hazardous motions.	s.185(2) – Guarding against endangerment		
3	If guarding is not practicable, machine construction, position, or attachment provides equivalent protection.	s.185(2) – Equivalent protection permitted		
4	Interlocked guards stop machine motion when opened or removed, and prevent restart until safe.	Best practice aligned with s.185 – Safe design of guards		
5	All fixed guards are securely fastened and cannot be easily removed without tools.	General duty – Prevent worker exposure to moving parts		
6	Safeguards do not create additional hazards (sharp edges, pinch points, poor visibility).	General duty – Guard must protect without adding risk		

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
7	Safe work procedures (lockout/tagout) are in place for inspection, cleaning, maintenance, and repair.	OHSA s.25(2)(h) – Employer duty to take every precaution reasonable		
8	Workers are trained in machine-specific hazards, safe use of guarding, and emergency stop procedures.	OHSA s.25(2)(a) – Employer duty to provide information, instruction, supervision		



Mobile Equipment

What Good Could Look Like

- Pre-use inspection with **brake-hold test on the steepest grade** used.
- Working lights/reflectors; back-up alarms and **spotter** where visibility risk exists.
- Documented competency (licence, site-specific assessment).
- Parked equipment: controls in **park, brake applied**, chocks as needed.
- Extinguisher present, inspected, accessible.

Key Compliance Actions

Verify Hazard Controls

- Verify the last brake-test and defect close-out.
- Ask an operator to describe blind-spot/reverse protocol.
- Check steering-assist fail condition in manuals and preventative maintenance.
- Ensure proper training for operators and pedestrians through traffic management.
- Supervise workers and ensure proper supervisor training.

Prove it!

- Defect log with repair dates; Preventative Maintenance records.
- Operator competency matrix and evaluations.
- Traffic management plan and spotter SOP.

Helpful Resources



Traffic Management Programs in Mines – MLITSD Guideline

Guidance published by the MLITSD to assist in complying with legal requirements for traffic management programs in mining.



Motor Vehicle Incident Resources – Workplace Safety North

Several resources developed by industry experts to assist organizations in understanding driving hazards and determining appropriate controls.

Mobile Equipment Compliance Verification Checklist (R.R.O. Reg. 854 – Section 105, Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces verify compliance with mobile equipment requirements under Section 105 of R.R.O. Reg. 854 (Mines and Mining Plants). Supervisors, safety representatives, and joint health and safety committees can use this tool to assess safe condition, operation, and inspection of mobile vehicles.

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
1	Mobile equipment is in safe working condition and free from defects before use.	s.105(1)(a) – Must be in safe working condition		
2	Brakes stop and hold the vehicle under full load on grades, slopes, and ramps.	s.105(1)(b) – Brakes must hold under full load conditions		
3	Headlights and tail lights are functional (except as exempted).	s.105(1)(c) – Must have headlights and tail lights		
4	Power-assisted steering systems allow vehicle control in event of failure (surface use).	s.105(1)(d) – Must allow safe control on failure		
5	Equipment is operated only by a competent, authorized operator.	s.105(1)(e) – Competency requirement		
6	Operator has a fixed seat where practical.	s.105(1)(f) – Fixed seat required where practical		

Inspection Item		Requirement	Compliant (Yes/No)	Notes/Corrective Actions
7	Manual equipment operated only when operator is in proper control position.	s.105(1)(g) – Proper control position required		
8	Remote-controlled/ automated equipment stops safely on system failure.	s.105(1)(h) – Fail-safe arrangement		
9	When unattended, equipment is parked safely: control in park, brake applied.	s.105(1)(i) – Parked safely when unattended		
10	Surface vehicles have lights/reflectors showing full width of vehicle.	s.105(1)(j) – Width lights or reflectors required		
11	When reversing where workers may be endangered, a spotter directs the operator.	s.105(1)(k) – Reverse with spotter if hazard exists		
12	Equipment is equipped with a type BC fire extinguisher in good condition.	s.105(1)(l) – Fire extinguisher required		
13	Pre-use inspections and preventive maintenance records are up to date.	Best practice – Compliance evidence		
14	Operators are trained in site-specific traffic rules, reversing protocols, and emergency procedures.	OHSA s.25(2)(a) – Provide instruction to workers		



Walkways and Elevated Working Platforms

What Good Could Look Like

- Correct rail heights throughout; no gaps at ends/returns; continuous toe-boards.
- Screens/mesh where tools/debris could fall; secure fixes (no zip-ties)

Key Compliance Actions

Verify Hazard Controls

- Tape-measure three points per span (start/mid/end).
- Look for missing mid-rails at ladder openings, pipe runs, platform corners.
- Train workers in requirements and work standards in line with legislation.
- Supervise workers and ensure proper supervisor training.

Prove it!

- Elevated work inventory with dimensions and photos.
- Corrective actions tracked; design standards referenced.
- Training records and standards.

Helpful Resources



Training for Working at Heights - MLITSD Guideline

Information about the mandatory work at heights training required under the construction regulations (213/91).



Fall Prevention Resources - Workplace Safety North

Several resources developed by industry experts to assist organizations in understanding fall hazards and determining appropriate controls.



Fall Prevention Poster - Workplace Safety North

Safety poster with tips to prevent slip, trip, and fall hazards from creating the potential for injuries for mining plants and elevated work areas.

Walkways and Elevated Working Platforms Compliance

|Verification Checklist

(O. Reg. 854 – Section 46, Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces verify compliance with requirements for elevated walkways and working platforms under Section 46 of O. Reg. 854 (Mines and Mining Plants). Supervisors, safety representatives, and joint health and safety committees can use this tool to ensure guardrails, mid-rails, and toe boards are in place on platforms more than 1.5 metres above the ground.

Inspection Item		Requirement (O. Reg. 854, s.46)	Compliant (Yes/No)	Notes/Corrective Actions
1	Every elevated walkway and platform more than 1.5 metres above ground has a top handrail.	s.46(3)(a) – Handrail required 0.91–1.07 m above floor		
2	Top handrail height is between 0.91 m and 1.07 m above the floor of the walkway or platform.	s.46(3)(a) – Handrail height requirement		
3	A second (mid-)rail is installed midway between top rail and floor, OR space is closed with a screen/mesh.	s.46(3)(b) – Mid-rail or screen required		
4	Toe boards at least 100 mm in height are installed along the edge of all platforms.	s.46(3)(c) – Toe boards ≥100 mm required		
5	Guardrails, mid-rails, screens, and toe boards are continuous with no missing sections.	s.46(3) – Continuous protection required		
6	Guardrails and toe boards are securely fastened and capable of withstanding loads.	General duty – Safe construction and secure fastening		

Inspection Item		Requirement (O. Reg. 854, s.46)	Compliant (Yes/No)	Notes/Corrective Actions
7	Openings for ladderways, stairs, or material access are protected with gates, chains, or removable rails.	Best practice aligned with s.46 – Prevent fall exposure		
8	Workers are trained in safe access and fall protection requirements related to elevated platforms.	OHSA s.25(2)(a) – Provide instruction to workers		



About Workplace Safety North

An independent not-for-profit, Workplace Safety North (WSN) is one of four sector-based health and safety associations in Ontario. Headquartered in northern Ontario, WSN administers the provincial mine rescue program and provides province-wide Ministry-approved workplace health and safety training and services for the mining and forest products industries.

With health and safety specialists and mine rescue officers located across the province, WSN and its legacy organizations have been helping make Ontario workplaces safer for more than 100 years. A leading provider of health and safety training and consulting, businesses call upon WSN for expert advice and information. For more information, visit workplacesafetynorth.ca.