

Compliance Pulse Check

Ontario Mining Sector
Compliance Resource

Based on compliance findings from:
July 1 to September 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.



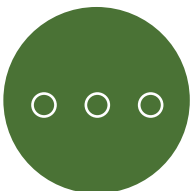
Calls to Action

Provide insight on what good *could* look like.



Supporting Tools

Tools to support compliance verification.



Hazard References

Icons reflective of the associated hazards.

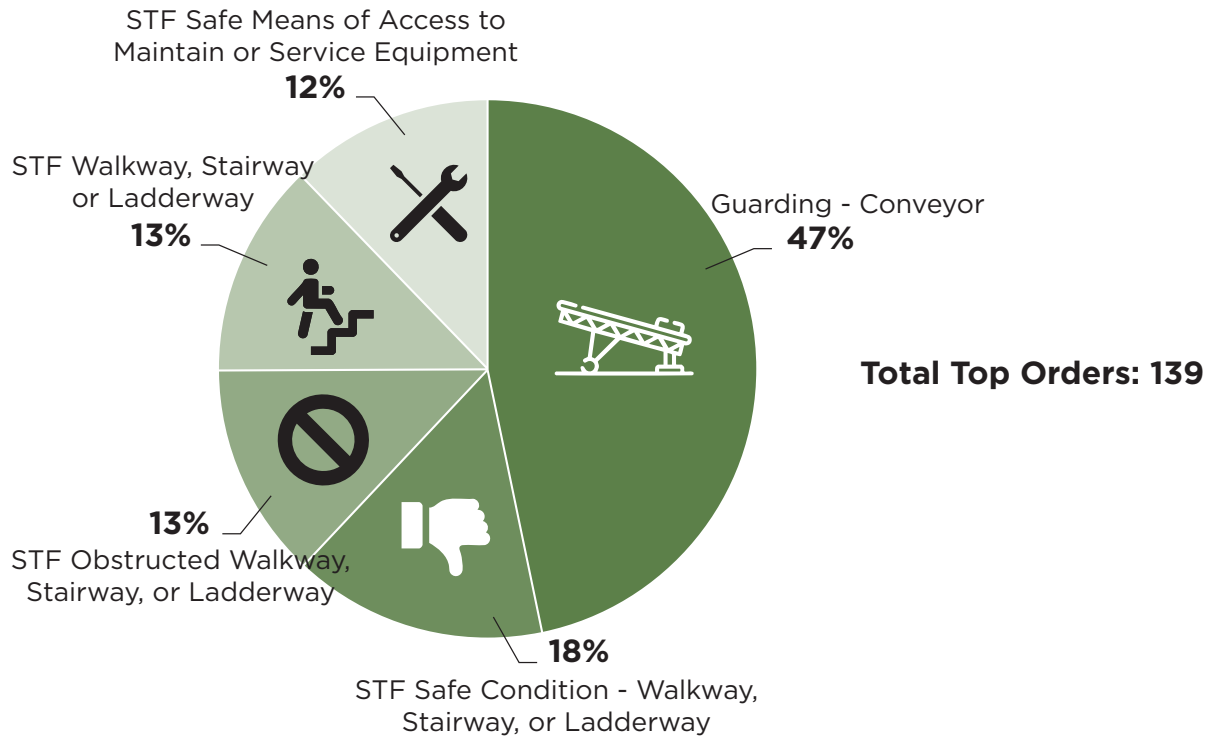


Helpful Links

Websites that may provide additional insight.

Top Orders and Requirements (Reg. 854)

July 1 to September 30, 2025



Hazard 1: Guarding Conveyors (47%)

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.
- Lack of appropriate training for workers.



Hazard 2: Slip, Trip and Fall – Safe Condition: Walkways, Stairways and Ladderways (15%)

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

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

Common gaps

- Poorly maintained walking and working surfaces.
- Hoses/cables across aisles; buildup on treads.
- Blocked walkways and improper housekeeping impacting working surfaces and access to workplaces.





Hazard 3: Slip, Trip and Fall - Obstructed Walkway, Stairway and Ladderways (13%)

Legislative Requirement: Access to workplaces – Reg. 854, s. 54(1)(b)

*Walkways, stairways and ladderways shall be **free from obstructions**.*

Common gaps

- Hoses, cables, or tools blocking walkways.
- Items improperly stored in walkways, stairways and ladderways.



Hazard 4: Slip, Trip and Fall - Safe Means of Access by Walkway, Stairway and Ladderways (13%)

Legislative Requirement: Access to workplaces – Reg. 854, s. 46(1)

*A **safe means of access to a workplace** shall be provided by a walkway, stairway or ladderway. R.R.O. 1990, Reg. 854, s. 46 (1).*

Common gaps

- Improperly maintained walkways, stairways and ladderways.
- Uneven, slippery, and damaged walking and working surfaces to gain access of the workplace or area



Hazard 5: Slip, Trip and Fall - Safe Means of Access to Maintain or Service Equipment (12%)

Legislative Requirement: Access to Workplaces – Reg. 854, s. 46(2)

*Where workers are required to work, operate, maintain or service equipment, **a safe means of access shall be provided as prescribed in subsection (1).** R.R.O. 1990, Reg. 854, s. 46 (2).*

Common gaps

- Workers accessing equipment or raised areas via unsafe or makeshift routes.
- No designated or maintained access path to new or modified workstations.





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	Pinch points on a conveyor are guarded by a guard that extends at least 0.9m from the pinch point.	s.196(3.1) – Guarding of pinch points		
2	If impracticable to guard, a fence, barricade, or a gate equipped with an interlocking device is in place to prevent access to the pinch points.	s.196(3.2) – Alternatives to guards		
3	Where guards, fence, barricade, or interlocking gate are not installed, the position or construction of the conveyor provides equivalent protection that renders the pinch point inaccessible (ex. the height of the pinch point)	s.196(3.3) – Inaccessible pinch points by position/design		
4	When a conveyor passes over a worker, a guard beneath the conveyor is installed.	s. 196 (4) – Guards beneath conveyors		
5	Where falling materials or parts may endanger a worker, a guard beneath the conveyor is installed.	s. 196 (4) – Guards beneath conveyors		

Inspection Item		Requirement (O.Reg.854)	Compliant (Yes/No)	Notes/Corrective Actions
6	In an underground mine, there are devices installed that guard against excessive slip between the belt and the driving pulley.	s. 196 (5) – Conveyors in underground mines		
7	In an underground mine, conveyors have a fire suppression system at the driven end unless fire retardant belting is used or the conveyor is continually attended by a worker.	s. 196 (5) – Conveyors in underground mines		
8	When undergoing repairs, adjustment, or maintenance, conveyors are stopped and the prime mover is de-energized, locked and tagged.	s. 196 (6) - Lock and tag		



Slip, Trip and Fall Prevention: Walkway, Stairway and Ladderway



1. Safe Condition



2. Means of Access to a Workplace



3. Obstructed



4. Means of Access to Maintain or Service Equipment

Note: Four of the five top findings involve requirements (in whole or in part) relating to walkway, stairway and ladderways. For an efficient and inclusive review of the hazard, this section has condensed into one Action Tool and is inclusive of the four hazards.

What Good Could Look Like

- **3-Point Contact Access Routes:** All ladders, stairs, and elevated access routes are designed to always allow for three points of contact (two hands and one foot or vice versa). Ladderways have adequate clearance for gripping and stepping, and rest platforms are provided for longer climbs.
- **Clean Walking and Working Surfaces:** Floors, stairs, and landings are kept clean, dry, and even, with anti-slip treads or coatings. Any spill or accumulation of mud, ice, or ore dust is promptly removed. Proper drainage and mats are installed where wet conditions are common.
- **Guarded or Covered Floor Openings:** Every opening in a floor or deck is guard-railed or securely covered. Covers are labelled with safe load limits and fastened so they cannot shift or dislodge. Temporary openings (e.g., for maintenance) have controlled access and signage.
- **Adequate Aisle and Access Widths:** Aisles and access routes are wide enough for both personnel and equipment movement, allowing for carrying tools and materials safely. Layouts respect the Ontario Fire Code requirements for egress.
- **Visibility and Lighting:** Access routes and stairs are well lit, with emergency lighting backup. Shadows, glare, and burnt-out fixtures are corrected immediately.
- **Signage and Marking:** All permanent access routes are clearly marked and unobstructed, with reflective or color-coded markings for visibility underground or in low-light areas.

Key Compliance Actions

Verify Hazard Controls

- **Establish and Enforce Housekeeping Standards:** Create written housekeeping standard operating procedures (SOPs) and frequency schedules. Assign accountability to supervisors for ensuring that all access ways remain clean and clear throughout shifts.
- **Walk Access Routes:** Supervisors or crew leads conduct a pre-shift inspection of all walkways, ladders, and stairways to identify obstructions, debris, or surface hazards. Hazards are corrected or reported immediately.
- **Verify Surface and Cover Integrity:** Try to lift any floor or sump cover — if it moves, it's non-compliant. Covers must be tight-fitting, labelled, and structurally sound.

(Continued on next page)



Slip, Trip and Fall Prevention: Walkway, Stairway and Ladderway

- **Check Lighting and Hand Clearance:** Verify that handholds, rails, and ladders have sufficient clearance for grip and movement, and that lighting provides adequate visibility to see steps and edges.
- **Worker Training:** Train workers on the proper use of Field Level Risk Assessments to capture walking and working surfaces, Housekeeping duties and inspection routines, proper defect reporting and lock-out/tag-out procedures when surfaces are unsafe, three-point contact and slip-trip-fall.
- **Supervisor Competency and Due Diligence:** Ensure supervisors are trained to a high standard in hazard recognition related to walking and working surfaces and understand their due diligence responsibilities for compliance.

Prove it!

- **Housekeeping program:** Documented standards and expectations including responsibilities, routes, frequencies, hazards and response times.
- **Winter control plan** with response times for snow, ice, or water accumulation.
- **Inspection documentation** such as photos and timestamps of clean access routes.
- **Corrective action logs** for obstructions, lighting repairs, or damaged treads.
- **Maintenance and work orders, service requests** for defective covers, loose handrails, or damaged steps.
- **Verification of repair completion dates;** leverage JHSC and other inspection to verify controls
- **SOPs and Training Records:**
 - SOPs for cleaning and surface maintenance.
 - Training records for workers and supervisors on slip, trip and fall prevention, safe access, and defect reporting.
- **Audits and Supervisor Logs:** Maintain evidence of ongoing audits or workplace inspections verifying compliance to Reg. 854 s.46 & s.54 such as Supervisor checklists signed off per shift.

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) and is inclusive of sections 54 and 46, focused on Safe Condition, Means of Access to a Workplace, Obstructed and Means of Access to Maintain or Service Equipment. 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	A safe means of access to a workplace is provided by a walkway, stairway, or ladderway	s.46(1) – A safe means of access to a workplace shall be provided by a walkway, stairway, or ladderway.		
8	Where workers are required to work, operate, maintain, or service equipment, a safe means of access is provided as required.	s.46(2) – Safe access must be provided for maintenance or servicing activities.		
9	Walkways and access platforms are structurally sound, stable, and able to support expected loads.	Derived from s.46 and s.54 – Walkways must be maintained to prevent collapse or instability.		
10	Guardrails, handrails, and mid-rails are provided where required to prevent falls from elevated surfaces.	Derived from s.46(3) – Elevated access requires fall protection barriers.		
11	Lighting along walkways, stairways, and ladderways is adequate to prevent slips, trips, and falls.	Best practice – General duty under OHSA s.25(2) (h).		
12	Workers using walkways, stairways, and ladderways are trained in safe access and housekeeping practices.	OHSA s.25(2)(a) – Employer must provide information, instruction, and supervision to protect 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.