

# Compliance Pulse Check

Ontario Mining Sector  
Compliance Resource

**Based on compliance findings from:**  
October 1 to December 31, 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.



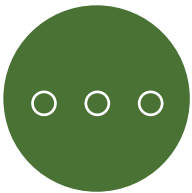
### **Calls to Action**

Provide insight on what good *could* look like.



### **Supporting Tools**

Tools to support compliance verification.



### **Hazard References**

Icons reflective of the associated hazards.

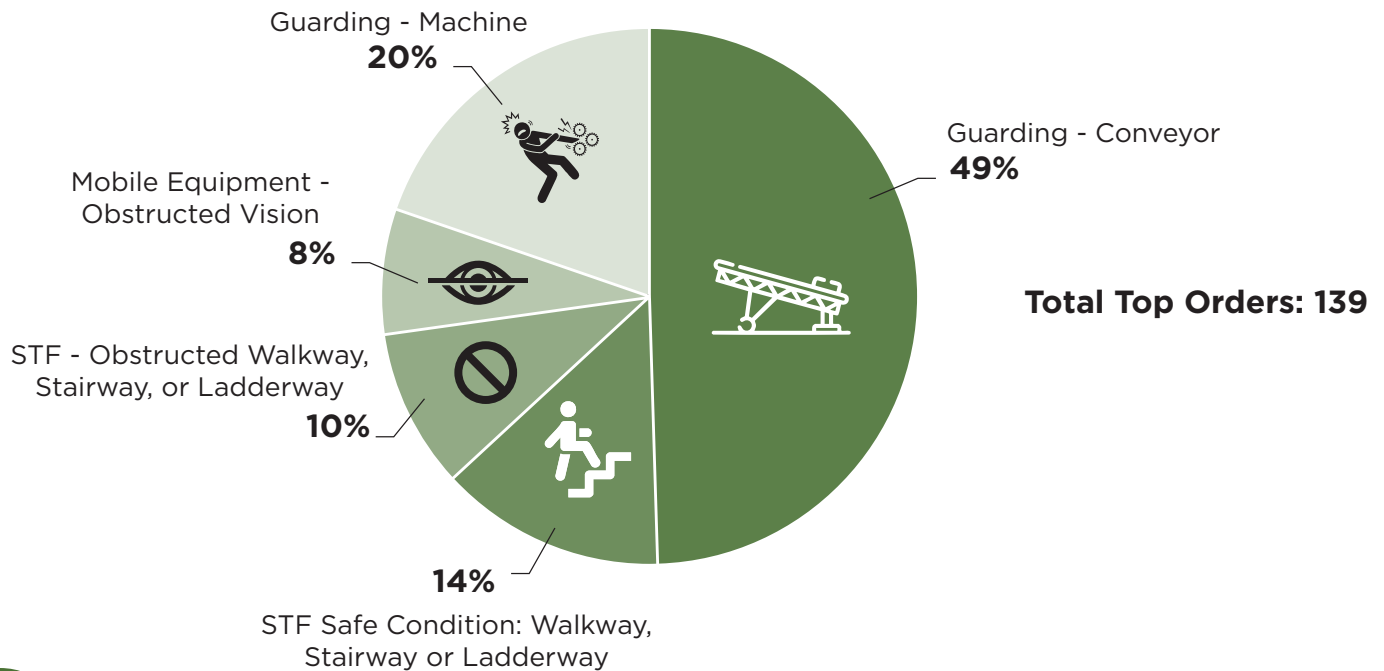


### **Helpful Links**

Websites that may provide additional insight.

# Top Orders and Requirements (Reg. 854)

October 1 to December 31, 2025



## Hazard 1: Guarding - Conveyors (49%)

**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 metres from the pinch point.***

### Common gaps

- Guards too short to meet 0.9 m requirement.
- Missing guards at return rollers.
- Reach distance not evaluated.
- Guard register absent.
- Guard damage not repaired.
- Equivalent protection undocumented.



## Hazards 2 & 3: Slips, Trips, Falls: Walkways, Stairways, Unsafe conditions (14%) and Obstructions (10%)

**Legislative Requirement:** Accesses 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*
- *cleared of hazardous material accumulations*

### Common gaps

- Loose or damaged grating.
- Uneven walking surfaces.
- Materials and tools obstructing travel ways.
- Emergency exits partially blocked by temporary storage.
- Reduced walkway widths.



## Hazard 4: Guarding - Machine Guarding (20%)

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

*A machine that has an exposed moving part that may endanger the safety of any person **shall be fenced or guarded unless its position, construction or attachment provides equivalent protection.***

### Common gaps

- Guards removed during troubleshooting.
- Guard integrity compromised.
- Guard inventory absent.
- Interlocks bypassed.
- Guard damage not reported.



## Hazard 5: Mobile Equipment - Obstructed Vision (8%)

**Legislative Requirement:** Haulage – Reg. 854, s. 105 (5).

*When in use a motor vehicle, other than a motor vehicle running on rails, **shall have a windshield and windows of the cab of a motor vehicle that shall consist of safety glass and be maintained so as to provide unobstructed vision.***

### Common gaps

- Dirty or scratched windshields reducing visibility.
- Fog or frost impairing operator vision.
- Cracked safety glass remaining in service.
- Inconsistent traffic control procedures.
- Mirrors damaged, missing, or poorly adjusted.

## Critical Injuries: Year-to-date, 2025-2026

Injury type	Count
Slips, trips, and falls	25
Loss of consciousness	21
Struck by incidents	9
Crush/pinch point	5
Environment	2
Motor vehicle incident	2
Falls from heights	2
Mobile equipment	1
Falls from equipment	1
Burns	1



# Call to Action and 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

## Hazard Identification - Ask Yourself:

- Can a worker reach a pinch point?
- Does guard extend  $\geq 0.9$  m?
- Are guards missing at return rollers?
- Were guards removed for cleaning?

## Immediate Red Flags

- Short guards.
- Missing guards.
- Damaged guards.
- Guard removed during maintenance.
- No equivalent protection.
- Reach path to pinch point.

## Common Gaps

- Guards too short to meet 0.9 m requirement
- Missing guards at return rollers
- Guards removed during cleaning
- No measurement verification program
- Reach distance not evaluated
- Guard register absent
- Guard damage not repaired
- Equivalent protection undocumented.

## What Good Could Look Like

- Guard measurement verification program
- Guard inventory with photos
- Pull-cord emergency stop coverage
- Interlocked access gates installed
- Guard reinstatement verification following maintenance
- Guard design standard implemented

## Prove It! (Evidence)

- Guard inventory
- Measurement records
- Inspection logs
- Maintenance records
- Operating procedures
- Training documentation

## 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 identified	s.196(3.1)		
2	Guard extends $\geq 0.9$ m	s.196(3.1)		
3	Guard prevents reach to pinch point	s.196(3.1)		
4	Guard securely fastened	s.196(3.1)		
5	No missing or damaged guards	s.196(3.1)		
6	Equivalent protection documented	s.196(3.1)		
7	Return rollers guarded	s.196(3.1)		
8	Guard reinstated after maintenance	Derived from s. 196(3.1)		
9	Inspection program implemented	Derived from s. 196(3.1)		
10	Worker awareness verified	Derived from s. 196(3.1)		



# Slips, Trips, and Falls: Unsafe Conditions and Obstructions

## Hazard Identification - Ask Yourself:

- Would an inspector see a slip, trip, or fall hazard immediately?
- Can workers walk the route without stepping around obstacles?
- Are surfaces dry, level, and stable?
- Is walkway width maintained despite storage or work activity?
- Are openings secured and protected?

## Immediate Red Flags

- Loose grating or raised edges.
- Hoses, cables, tools in travel paths.
- Accumulated slurry, water, mud, or ice.
- Congested walkways.
- Missing or unsecured opening covers.
- Poor lighting obscuring hazards.

## Common Gaps

- Loose or damaged grating creating uneven walking surfaces.
- Raised edges and unsecured plates producing trip hazards.
- Hoses, cables, tools, and stored materials obstructing travelways.
- Emergency exits partially blocked by temporary storage.
- Reduced walkway width following process modifications.
- Congestion at maintenance and high-traffic areas.
- Slurry, water, mud, dust, or ice accumulation not cleared promptly.
- Temporary covers unsecured or not load rated.
- Missing guardrails at floor openings.
- Covers not labeled or identifiable.
- Inadequate lighting reducing hazard visibility.

## What Good Could Look Like

- Walkway zoning with painted boundaries and signage
- Defined housekeeping ownership and response timelines
- Anti-slip surfaces installed in wet areas
- Drainage systems functioning and maintained
- Winter slip, trip, and fall control program implemented
- Walkway width designed for pedestrian and material traffic
- Load-rated covers secured and labeled
- Joint health and safety committee targeted STF inspections
- Digital inspection tracking of walkway hazards



# Slips, Trips, and Falls: Unsafe Conditions and Obstructions

## Key Compliance Actions

- Shift start documented walkway inspections
- Immediate removal of obstructions
- Spill response protocol activation
- Traction and surface integrity assessment
- Drainage and water accumulation verification
- Lift-test of floor opening covers
- Guardrail integrity inspection
- Lighting adequacy validation
- Pedestrian and mobile equipment interface review

## Prove It! (Evidence)

- Housekeeping inspection logs with timestamps
- Corrective action work orders and closure tracking
- Photographic documentation of repairs
- Walkway design drawings and layout maps
- STF hazard assessments and risk mapping
- Joint health and safety committee inspection reports
- Winter slip prevention program documentation
- Supervisor field audit records
- Worker training and competency records

## 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	Walking surfaces structurally sound and stable	s.54(1)(a) – Must be maintained in a safe condition		
2	Grating intact and securely fastened	s.54(1)(a)		
3	No loose plates or raised edges	s.54(1)(a)		
4	Anti-slip surfaces present where required	Derived from s.54(1)(a)		
5	Walkways free from hoses, cables, and tools	s.54(1)(b)		
6	Stored materials not encroaching on travelways	s.54(1)(b)		
7	Emergency egress routes unobstructed	s.54(1)(b)		
8	Walkway width adequate for traffic	s.54(1)(c)		
9	Congestion risk areas identified and controlled	s.54(1)(c)		

10	Spills cleared promptly	s.54(1)(d)		
11	Drainage functioning effectively	Derived from s.54(1)(d)		
12	Ice/slurry control measures implemented	s.54(1)(d)		
13	Floor openings guarded or covered	Derived from s.54(1)		
14	Covers secured against displacement	Derived from s.54(1)		
15	Covers load-rated and labeled	Derived from s.54(1)		
16	Lighting adequate for safe movement	Derived from s.54(1)		
17	Inspection frequency documented	Derived from s.54(1)		



# Machine Guarding

## Hazard Identification - Ask Yourself:

- Can a worker reach a moving part?
- Has guarding been removed for troubleshooting?
- Are guards damaged or loose?
- Is equivalent protection documented where guarding absent?

## Immediate Red Flags

- Missing guards.
- Guard removed and not reinstalled.
- Reach path to hazard.
- Interlocks bypassed.
- Temporary guarding solutions.
- Guard damage not repaired.

## Common Gaps

- Guards removed during troubleshooting.
- Guard integrity compromised.
- Reach envelope hazards not assessed.
- Equivalent protection undocumented.
- Guard inventory absent.
- Interlocks bypassed.
- Temporary guarding solutions used.
- Guard damage not reported.

## What Good Could Look Like

- Guard inventory with photographs
- Guard inspection program implemented
- Interlock verification program
- Guard reinstatement sign-off following maintenance
- Safeguarding risk assessments conducted
- Engineering justification for equivalent protection documented



# Machine Guarding

## Key Compliance Actions

- Reach test guarding effectiveness
- Inspect guard integrity and fastening
- Validate interlock functionality
- Verify guard reinstatement after maintenance
- Audit equivalent protection justification
- Conduct safeguarding risk review

## Prove It! (Evidence)

- Guard inventory documentation
- Safeguarding risk assessments
- Guard inspection logs
- Interlock test records
- Maintenance verification records
- Worker training documentation

## 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 for Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces assess compliance with Machine Guarding requirements under Section 185 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	Exposed moving parts guarded	s.185(2)		
2	Guard prevents reach to hazard	s.185(2)		
3	Guard securely fastened	s.185(2)		
4	Guard integrity intact	s.185(2)		
5	Equivalent protection documented	s.185(2)		
6	Interlocks functional	Derived from s. 185(2)		
7	Guard reinstated after maintenance	Derived from s. 185(2)		
8	No bypassed guards	Derived from s. 185(2)		
9	Inspection program implemented	Derived from s. 185(2)		
10	Worker awareness verified/records	Derived from s. 185(2)		



# Mobile Equipment: Obstructed Vision

## Hazard Identification - Ask Yourself:

- Can operator see clearly in all directions?
- Are windows clean and intact?
- Are mirrors and cameras functional?
- Are visibility obstructions present inside cab?

## Immediate Red Flags

- Dirty or cracked windshields.
- Fogging or frost.
- Decals blocking view.
- Cab clutter impairing visibility.
- Damaged mirrors.
- Blind spot hazards unmanaged.

## Common Gaps

- Dirty or scratched windshields reducing visibility.
- Fogging or frost impairing operator vision.
- Cracked safety glass remaining in service.
- Window tinting or decals obstructing view.
- Equipment or attachments blocking operator sightlines.
- Cab clutter impairing visibility.
- Mirrors damaged, missing, or poorly adjusted.
- Blind spots unmanaged.
- Inconsistent traffic control procedures.

## What Good Could Look Like

- Cab visibility inspection standard implemented
- Daily window and mirror cleaning program
- Blind spot hazard mapping completed
- Traffic management plan documented
- Reverse camera and proximity detection systems installed
- Operator visibility risk assessments conducted
- Digital vehicle inspection program implemented



# Mobile Equipment: Obstructed Vision

## Key Compliance Actions

- Clean windows and mirrors each shift
- Verify safety glass integrity
- Remove decals or obstructions
- Adjust mirrors for full visibility
- Validate reverse procedure compliance
- Conduct blind spot assessment
- Audit traffic management implementation

## Prove It! (Evidence)

- Pre-use inspection forms
- Cab inspection logs
- Traffic management plan
- Blind spot hazard assessment documentation
- Supervisor ride-along audits
- Operator training records

## 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: Obstructed Vision Verification Checklist (Reg. 854 Section (105)(5) for Mines and Mining Plants)

This checklist is designed to help Ontario mining workplaces assess compliance with Obstructed Vision requirements under Section 105 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	Windshield consists of safety glass	s.105(5)		
2	Windows clean and unobstructed	s.105(5)		
3	No cracks impairing vision	s.105(5)		
4	Mirrors intact and adjusted	Derived from s.105(5)		
5	No decals obstructing operator view	s.105(5)		
6	Cab clutter removed	Derived from s.105(5)		
7	Reverse camera functional if installed	Derived from s.105(5)		
8	Traffic management controls implemented	Derived from s.105(5)		
9	Blind spot procedures established	Derived from s.105(5)		
10	Pre-use inspection completed	Derived from s.105(5)		



## 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](http://workplacesafetynorth.ca).