Ontario Federation of Agriculture

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First Aid Modernization Proposal
Health, Safety and Insurance Policy Branch
Ministry of Labour, Training and Skills Development
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Toronto ON
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RE: 21-MLTSD 001 First Aid Modernization Consultation

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Labour, Training, and Skills Development (MLTSD) on the First Aid Modernization Consultation. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

OFA represents the interests of Ontario's farm businesses – the employers of farm labour. In that role, we take our obligations to farm workers seriously and believe that all farm workers, from both Canada and abroad, should be treated with dignity and respect, and be provided with a safe, fair and rewarding work environment and this involves providing an emergency response to workplace injuries.

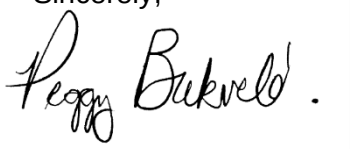
OFA supports the transfer of workplace first aid responsibilities from the Workplace Safety and Insurance Board (WSIB) to MLTSD. This is a reasonable change and follows from earlier actions that transferred prevention related activities under WSIB to the authority of MLTSD. While we support this move, we reserve our final comments and approval until the new draft regulation under the Occupational Health and Safety Act (OHSA) has been drafted and circulated.

It is important to note within the context of any increase in first aid training requirements, that the nature of agricultural production often places employers and workers far away from service providers creating additional barriers to accessing training. Furthermore, rural internet service is often slow and reliability and may also create a barrier to easily accessing online training opportunities. Agriculture is also increasingly employing a multinational workforce with challenging language and literacy issues. We request that MLTSD consider these challenges when drafting a new OHSA first aid regulation and do not make drastic changes that could limit the number of service providers that can provide training certification.

OFA requests that MLTSD take a flexible approach to implementing a new first aid regulation under OHSA and allow sufficient time for workplaces to adapt to any new requirements. It is reasonable to allow for a grace period to allow employers and workplaces to get up to speed with any requirements that are additional to what is currently required under Regulation 1101. We believe MLTSD must invest in a strong communications campaign to alert employers of any new requirements following these modernization efforts.

OFA appreciates the opportunity to comment on the proposed modernization of first aid requirements in Ontario's workplaces. We look forward to commenting on the draft regulation when it is available.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors