



Environmental Health & Safety Audit Protocol Alberta, Canada 2022

STP ComplianceEHS (STP) announces the release of its recently updated EHS audit protocol for Alberta, Canada. This audit protocol, which covers relevant national and provincial EHS requirements, was previously updated in March 2021. The regulatory date for the current release is March 2022.

new and noteworthy

- **GHG Reporting:** *Notice with Respect to the Reporting of Greenhouse Gases (GHGs) for 2021, Canada Gazette Part I, Vol. 155, No. 51, December 18, 2021*, covering calendar year 2021, informs facilities of the government's intention to collect data on greenhouse gas emissions for the purpose of conducting research, creating a national inventory, formulating objectives and codes of practice, issuing guidelines or assessing or reporting on the state of the environment. Similar Notices for the reporting on greenhouse gas emissions have been published annually since 2004. Reporting requirements under this Notice are essentially the same as was required for the 2020 reporting year. The Notice entered into force on December 18, 2021.

This change impacts:

- **Section 3.0 – Air Emissions:** Subsection 11 – Greenhouse Gas (GHG) Emissions – Federal was updated.
- **Waste Import and Export:** The *Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations, SOR/2021-25* were adopted to consolidate and update the administrative requirements for the import and export of hazardous waste and hazardous recyclable materials both within Canada and internationally. These Regulations repealed and replaced the requirements in the *PCB Waste Export Regulations, 1996, SOR/97-109*, the *Interprovincial Movement of Hazardous Waste Regulations, SOR/2002-301*, and the *Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations, SOR/2005-149*. These Regulations entered into force on October 31, 2021.

This change impacts:

- **Section 4.0 – Solid and Hazardous Waste:** Previous Subsection 5 – Import and Export of Hazardous Wastes for Disposal or Recycling – Federal was deleted (subsequent subsections were renumbered accordingly), and current Subsection 5 – Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material – Federal (previously Subsection 6 – Manifests for Interprovincial Transport of Hazardous Waste – Federal) was updated.
- **Section 8.0 – PCBs:** Subsection 10 – Import and Export of PCB Waste – Federal (previously Subsection 10 – Export of PCB Waste – Federal) was updated.

release notes

please review

- **Occupational Health and Safety:** New occupational health and safety legislation was published to replace previous versions of the legislation, including the *Occupational Health and Safety Act, S.A. 2020, c. O-2.2* (replacing the 2017 Act of the same name) and the *Occupational Health and Safety Code, A.R. 191/2021* (replacing the 2009 Code of the same name). In general, the new legislation is intended to eliminate duplication and move requirements from other pieces of legislation into the OHS Act and Code. The *Radiation Protection Act* and *Radiation Protection Regulation* were transitioned into the new Act and Code. The majority of the 2003 version of the *Occupational Health and Safety Regulation* was also moved into the new Act and Code. However, the new *Occupational Health and Safety Regulation, A.R. 184/2021* provides some minor applicable provisions. Other significant amendments were made throughout the applicable requirements as adopted by the new Act and Code.

While these changes affect, in terms of updating regulatory references, the majority of subsections in protocol Sections 9.0 – 13.0 and 15.0 – 17.0, they most significantly impact:

- **Section 9.0 – Asbestos:** Subsection 1 – General Requirements and Subsection 2 – Exposure to Release of Asbestos were updated.
- **Section 10.0 – General Health and Safety:** Subsection 1 – Incident, Injury and Illness Reporting (previously Subsection 1 – Accident, Injury and Illness Reporting); Subsection 2 – Medical Examinations; Subsection 4 – Hazard Assessment, Evaluation and Control; Subsection 5 – Workplace Violence and Harassment (previously Subsection 5 – Workplace Violence); Subsection 7 – Joint Work Site Health and Safety Committee and Health and Safety Representatives; and Subsection 9 – Health and Safety Programs were updated.
- **Section 11.0 – Equipment, Machine and Electrical Safety:** Subsection 1 – General Equipment Safety was updated.
- **Section 15.0 – Industrial Hygiene:** Subsection 9 – Occupational Exposure to Radiation was updated.
- **Section 16.0 – Chemical Management:** Subsection 3 – WHMIS: Hazardous Products Labeling – Federal and Alberta, and Subsection 11 – Radiation Equipment were updated.

highlights of this release

Section 3.0 – Air Emissions

- Minor updates were made to Subsection 12 – Greenhouse Gas (GHG) Emissions – Federal due to amendments to the *Greenhouse Gas Pollution Pricing Act, S.C. 2018, c. 12, s. 186* and the *Output-Based Pricing System Regulations, SOR/2019-266*.
- New questions were added to Subsection 7 – Multi-Sector Air Pollutants – Stationary Spark-Ignition Engines – Federal to incorporate additional requirements from the *Multi-Sector Air Pollutants Regulations, SOR/2016-151* that have been phased into effect.
- New Subsection 20 – Formaldehyde Emissions from Composite Wood Products – Federal was added to incorporate requirements of the *Formaldehyde Emissions from Composite Wood Products Regulations, SOR/2021-148*. These Regulations limit the concentrations of formaldehyde in composite wood panel or laminated products. They also specify testing, record keeping, and labeling requirements. The Regulations take effect on January 7, 2023.

Section 4.0 – Solid and Hazardous Waste

- Numerous new questions were added to, and existing content updated in, Subsection 7 – Landfills and Compost Facilities as a result of the *Code of Practice for Compost Facilities, 2022* replacing the *Code of Practice for Compost Facilities, 1997*.

Section 5.0 – Water Resources

- Subsection 4 – Protection of Navigable Waters – Federal was updated to incorporate the provisions of the *Minor Works Order, SOR/2021-170*. This Order specifies the type of works that are classified as minor works for purposes of the *Canadian Navigable Waters Act, R.S.C. 1985, c. N-22*. It allows for works to be built, without review or approval, if they meet the criteria for the applicable class of works, as well as specific terms and conditions. It also establishes reporting requirements for these types of works.

Section 14.0 – Transport of Dangerous Goods

- Appendix 14-A, “Definitions” was updated to include more recent versions of the applicable definitions for the *Transportation of Dangerous Goods Regulations, SOR/2001-286* and *Transportation of Dangerous Goods Act, 1992, S.C. 1992, c. 34*.

Section 16.0 – Chemical Management

- The introductory notes to Subsection 3 – WHMIS: Hazardous Products Labeling – Federal and Alberta were revised to include comments regarding Canada’s progress on implementing the 6th and 7th revisions of GHS into WHMIS legislation. Amendments to the *Hazardous Products Act, R.S.C. 1985, c. H-3* and the *Hazardous Products Regulations, SOR/2015-17* are expected in the summer of 2022.
- Minor changes were made to Subsection 23 – Import and Manufacture of Products Containing 2-Butoxyethanol – Federal because of an amendment to the *2-Butoxyethanol Regulations, SOR/2006-347* regarding accredited laboratories that conduct analysis of a product to determine the concentration of 2-butoxyethanol.



industry insight

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