



Environmental Health & Safety Audit Protocol Quebec, Canada 2022

STP ComplianceEHS (STP) announces the release of its recently updated EHS audit protocol for Quebec, Canada. This audit protocol, which covers relevant national and provincial EHS requirements, was previously updated in January 2021. The regulatory date for the current release is January 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 24 – 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 These Regulations repealed and replaced the requirements in the *PCB Waste Export Regulations, 1996, SOR/97-109*, the *Interprovincial Movement of Hazardous Waste Regulations,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:** Subsection 5 – Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material – Federal (previously Subsection 5 – Manifests for Interprovincial Transport of Hazardous Waste – Federal) was updated, and previous Subsection 12 – Import and Export of Hazardous Wastes for Disposal or Recycling – Federal was deleted.
- **Section 8.0 – PCBs:** Subsection 12 – Import and Export of PCB Waste – Federal was updated.

release notes

please review

● **Modernizing Health and Safety for Employment Injuries/Illness:**

On October 6, 2021, *An Act to Modernize the Occupational Health and Safety Regime (2021, chapter 27)* was adopted to update requirements regarding the prevention of and compensation for employment injuries and illnesses. This Act made amendments to other Acts and Regulations, including:

- *Act Respecting Industrial Accidents and Occupational Diseases, C.Q.L.R., c. A-3.001;*
- *Act Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1;*
- *Safety Code for the Construction Industry, C.Q.L.R., c. S-2.1, r. 4;* and
- *Regulation Respecting Prevention Programs, C.Q.L.R., c. S-2.1, r. 10.*

The Act also adopted the *Regulation Respecting Occupational Diseases* (no C.Q.L.R. reference yet) and repealed the *Regulation Respecting Health and Safety Committees, C.Q.L.R., c. S-2.1, r. 5*, the *Regulation Respecting Safety Representatives in Establishments, C.Q.L.R., c. S-2.1, r. 12*, and the *Regulation Respecting Occupational Health Services, C.Q.L.R., c. S-2.1, r. 16*.

The amendments of the Act impact many sections throughout the protocol; however, the following sections and subsections were significantly impacted:

- **Section 10.0 – General Health and Safety:** Subsection 2 – Health and Safety Committees and Representatives and Subsection 3 – Prevention Programs were updated.
- **Section 15.0 – Industrial Hygiene:** Subsection 12 – Medical Surveillance for Exposure to Occupational Risks was updated.
- **Section 17.0 – Construction Work Site Safety:** Subsection 1 – Notifications and Programs and Subsection 2 – Job-Site Committees, Representatives and Coordinators (previously Subsection 2 – Job-Site Committees and Safety Officers) were updated.

highlights of this release

Section 3.0 – Air Emissions

- Minor updates were made to the introductory notes to Subsection 23 – Greenhouse Gas Emissions over 25,000 Tonnes per Year as a result of amendments to the *Regulation Respecting a Cap-and-Trade System for Greenhouse Gas Emission Allowances, C.Q.L.R., c. Q-2, r. 46.1*. The amendments update the scope of the term “emitter.”
- New questions were added to Subsection 27 – 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 28 – 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

- Subsection 7 – Residual Materials Incinerators was updated due to an amendment to the *Regulation Respecting the Landfilling and Incineration of Residual Materials, C.Q.L.R., c. Q-2, r. 19*.

Section 5.0 – Water Resources

- Subsection 20 – 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 9.0 – Asbestos

- Subsection 9 – Moderate-Risk Work at Construction Sites and Subsection 10 – High-Risk Work at Construction Sites were updated due to amendments to the *Safety Code for the Construction Industry, C.Q.L.R., c. S-2.1, r. 4* regarding respirators.

Section 10.0 – General Health and Safety

- Minor updates were made to the definitions in the introductory notes to the rulebook for this protocol section as a result of amending legislation.
- Subsection 1 – General Requirements was updated as a result of amendments to the *Act Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1*.
- Previous Subsection 4 – Hazard Assessments was deleted and subsequent subsections were renumbered accordingly.
- Subsection 6 – Accident and Injury Reporting was updated as a result of amendments to the *Act Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1*.

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 15.0 – Industrial Hygiene

- Previous Table 15-4, “Daily Quantity of Drinking Water Required by Workers” was removed as it is no longer applicable, and new Table 15-4, “Continuous Sound Pressure Level Standards” was added to incorporate new values applicable to amendments regarding occupational noise. Previous Tables 15-5, “Continuous Noise Standards,” and 15-6, “Impact Noise Standards” were removed to streamline the transition to the new occupational noise requirements.
- Subsection 2 – Ventilation and Heating, Subsection 8 – General Workplace Air Quality, and Subsection 10 – Respiratory Protection were updated due to amendments to the *Regulation Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1, r. 1* regarding respirators.
- Subsection 7 – Provisions for Drinking Water was updated due to amendments to the *Regulation Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1, r. 1*.

release notes

please review

- Subsection 11 – Protective Equipment and Safety Measures was revised to update the applicable standards that apply in accordance with the *Regulation Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1, r. 1*.
- Subsection 18 – Occupational Noise – As of June 16, 2023 was added due to amendments to the *Regulation Respecting Occupational Health and Safety, C.Q.L.R., c. S-2.1, r. 1*, which will take effect in 2023. As of June 16, 2023, Subsection 17 – Occupational Noise – Prior to June 16, 2023 will no longer be effective.

Section 16.0 – Chemical Management

- The introductory notes to Subsection 7 – Hazardous Products Labeling – Federal were revised to include comments on 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 in Subsection 26 – 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.

Section 17.0 – Construction Work Site Safety

- Subsection 4 – First Aid Personnel, Kits and Rooms was updated to reflect minor amendments to the *First Aid Minimum Standards Regulation, C.Q.L.R., c. A-3.001, r. 10*.
- Amendments to the *Safety Code for the Construction Industry, C.Q.L.R., c. S-2.1, r. 4* impact the following subsections:
 - Subsection 13 – Personal Protective Equipment (PPE) was revised and one question removed;
 - Subsection 14 – Air Quality and Respirator Protection Significant was significantly updated;
 - Subsection 15 – Exposure to Sand Blasting Dust One was revised and one question removed;
 - Subsection 18 – Construction Tools One was revised and two questions were removed;
 - Subsection 19 – Electrical Equipment Significant was significantly updated;
 - Subsection 21 – Scaffolding Several was updated;
 - Subsection 23 – Confined Spaces was updated;
 - Subsection 28 – Work Near Aerial Electrical Lines One was updated; and
 - Subsection 29 – Explosive Actuated Tools Several was updated.



industry insight

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