Compliance Review

eSafetyFirst Canada Confined Space Online Training

Course

The purpose of this document is to outline the compliance review for the eSafetyFirst Canada (eSafetyFirst) online Confined Space Training course. The course was viewed in its entirety and then reviewed chapter by chapter to determine both compliance and alignment with the CSA Z1006-16 standard. This standard is used in all Canadian jurisdiction for reference when establishing legislation around confined spaces.

There is small difference is that because Newfoundland and Labrador require a WorkplaceNL approved "hands-on" training course this course is not applicable in NL and eSafetyFirst makes that clear on the course enrollment page.

Each section in the remainder of this report will contain points required for compliance with the CSA standard as the remining jurisdictions in Canada use the standard as their legislation benchmark. Each section will also note any recommendations for changes or revisions, if any, that need to be added to meet compliance. The report will also contain non-technical recommendations to improve or correct content.

The eSafetyFirst Confined Space course does not measure any practical training or assessments, it is also important to mention that Canadian jurisdictions do not necessarily require workers to have a practical assessment unless there are other duties or functions such as first aid or rescue. eSafetyFirst notes a lot of additional information in a supplement information page on Confined Spaces found here, https://esafetyfirst.com/blog/confined-spaces-safety-definition-purpose-and-hazards/

An excerpt from this pages notes the following:

For workers who work around confined spaces (pre-entry), the online training is enough. For workers who require confined space entry, hands-on practice is essential to develop the necessary skills and proficiency in using specialized equipment, performing rescue procedures, and effectively managing the hazards associated with confined spaces. Online courses typically do not provide the opportunity for direct hands-on training in these specific tasks.

eSafetyFirst provides a training matrix for learners of additional training requirements that may be needed depending on the worker's functions and duties in a confined space environment.

Addressed corrective actions will be denoted in **BOLD RED** font

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1. Foundation, definitions, and legislation

- **Confined space concepts:** Learners need to be able to define “confined space” and, where applicable, “restricted space” and “hazardous confined space,” and distinguish them from normal work areas. They also need to understand how the different terms for the spaces differ based on atmospheric hazards, entry/exit constraints, and design for continuous occupancy. All of this is achieved in Module 1 of the course.
- **Legal Framework:** Module 1 provides a good summary of the roles and responsibilities of the Employer, Supervisor, Worker, and Attendant as defined by provincial legislation and the CSA standard.
- **Jurisdictional requirements:** The eSafetyFirst course notes the key confined space provisions in applicable OHS legislation and regulations and explains the interaction with CSA Z1006-16 as a best-practice standard and how it forms the legal enforcement framework for most Confined Space legislation in Canada. eSafetyFirst also is quick to note that employers, entrants and other persons with Confined Space duties have to be aware of their own provincial legislation.

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2. Confined space program, roles, and responsibilities

- **Confined space management program:** Learners need to be made aware of the required elements of a confined space management program (also referred to in some jurisdictions as a Code of Practice)(policy, identification, risk assessment, controls, training, emergency response, documentation, etc) consistent with CSA Z1006-16.
- **Roles and responsibilities:** Learners will need to be provided an overview of the responsibilities of employers, supervisors, workers, attendants/monitors, entry permit issuers, and rescue personnel in relation to confined space work. This is another element required in a Confined Space Program. Module 2 outlines this quite well and goes in depth with all of the responsibilities for each.
- **Contractors and external service providers:** The course should explain expectations for coordination and communication when contractors or external

rescue/emergency services are involved in confined space work and their responsibilities within a program

The eSafety course notes some of the required points for a Confined Space Program in Module 3 on Slide 3. It also goes further into some of the additional requirements such as roles and responsibilities of each of the different workers that would involved in confined space entry and so forth in subsequent slides. However, there is no clear distinction on what a program is. On slide 3 the lines start to get blurred between a confined space entry plan and a program. Every jurisdiction in Canada requires employers to perform the following and have some sort of documented process for:

- Identifying confined spaces
- Assessing hazards associated with confined spaces
- Implement controls for those hazards
- Establishing entry procedures
- Preparation of an emergency plan
- Training workers
- Documentation, maintenance and retention

This is essentially a program. While a plan on the other hand is a situational document that is written prior to the space being entered. This is also a requirement in most jurisdictions.

~~It is suggested that eSafety add another slide or two detailing a program and the distinction between a plan and a program. The contents of a Confined Space Program are well summarized here,~~
~~https://www.ccohs.ca/oshanswers/hsprograms/confinedspace/confinedspace_program.html~~

~~As mentioned there is coverage about all of the elements of a program in the different modules but not clear distinction between a plan and program and no clear reference.~~

Slide have been added that address and correct this.

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3. Identification, classification, and hazard recognition

- **Identification and designation of spaces:** Students need to be able to identify confined spaces and, where applicable, the difference between restricted spaces and confined spaces based on atmospheric hazards. This is covered very well in modules 1 and 2.

- **Hazard types:** The course provides student with the ability to recognize typical confined space hazards, including:
    - atmospheric (oxygen deficiency/enrichment, toxic gases, flammable atmospheres)
    - physical (engulfment, entrapment, mechanical, noise, temperature, radiation)
    - chemical and biological agents
    - energy sources and process-related hazards

  It needs to be noted that the slides show very good accompanying pictures including sand and gravel when talking about entrapment which unfortunately happens far too often in Canada.
- **Perform Hazard Assessments:** The course provides good awareness on physical hazards (e.g., engulfment, mechanical, electrical) and atmospheric hazards (e.g., oxygen deficiency, toxic gases, flammable vapors).
- **Hierarchy of Controls:** The course does well to demonstrate to students how to select and apply the hierarchy to eliminate or mitigate risks, prioritizing **Prevention Through Design (PtD)** and engineering controls over Personal Protective Equipment (PPE)

~~**Important note - Module 1 Slide 16:** The slide shows the different requirements between a confined space and a hazardous confined space. The first point is a comparison for hazard assessments. It says they are not necessary for confined spaces. It would be best to omit this line from the table as it is extremely confusing. Hazard assessments are a requirement for all restricted and confined spaces and in fact are for the most part ongoing while an entrant is inside.~~ **This slide has been corrected.**

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4. Hazard assessment, controls, and permits

- **Hazard and risk assessment:** The course describes the steps of a confined space hazard and risk assessment, including documenting scope, tasks, hazards, and control measures, and recognizing when reassessment is required.
- **Isolation Procedures:** Participants are given a good overview of "Lockout/Tagout" (LOTO) and it applies to confined space

- **Ventilation and purging:** The course provides a definitions for purging, inerting and ventilation. It goes further to describe when and how to use each to control atmospheric hazards, and the need for verification by testing.
- **Entry permits:** Permits are thoroughly explained along with:
    - Entry time validity and duration
    - Who can enter the space
    - How many persons can enter the space and reason for entry
    - Other necessary documentation such as a variance on changing safeguards

  The course shows an example permit and describes the required content for a permit and how it needs to be present at the site.

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5. Atmospheric testing, monitoring, and equipment

- **Atmospheric testing principles:** The course explains why atmospheric testing is required, when it must be performed (pre-entry and ongoing), and the sequence of testing (e.g., oxygen, flammables, toxics).
- **Gas detection equipment:** The course provides an overview the basic operation, limitations, calibration/ bump-test requirements, and proper use of gas detection instruments used for confined space work in Module 3. This section also notes that this is a duty that requires competency to perform correctly.
- **Continuous monitoring:** The course explains when continuous or periodic monitoring is required (such as during hot work in a and how results must be communicated to the entry team and documented.
- **Signage and tagging:** The course provides an overview of signage, tags, and barricades used to control access to confined and restricted spaces.

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6. PPE, tools, and safe work practices

- **Personal protective equipment:** Students are provided with an overview of PPE commonly used in confined spaces (e.g., respiratory protection, fall protection, head/eye/hand protection, protective clothing) and explain selection, use, and limitations in relation to identified hazards. The course also notes that CSA

approved equipment must be used and additional training may be required, for example if fall protection is required.

- **Respiratory protection basics:** The course takes steps to differentiate between air-purifying and atmosphere-supplying respirators and state when each may be required for confined space work.
- **Access/egress and work methods:** Students are provided and explanation of safe entry, work, and exit procedures, including communication protocols, housekeeping, and maintaining means of escape in Module 4
- **Attendant/monitor practices:** Explain the duties of the attendant/monitor, including continuous monitoring of entrants, controlling access, maintaining communication, and initiating emergency procedures without entering the space.

~~Note, while all PPE is discussed thoroughly, the course should make mention that respirators will require fit testing prior to use. This is sort of explained in Module 2 when talking about limitations and maintenance but needs to be explicitly explained as fit testing is a requirement of respirators in all jurisdictions.~~ **A slide has been added that addresses and corrects this.**

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7. Emergency planning and rescue

- **Emergency response planning:** Module 4 goes very in depth in explaining the required elements of a confined space emergency plan, including roles, communication, equipment, and coordination with internal or external responders.
- **Rescue methods and limitations:** The course distinguishes between self-rescue, non-entry rescue, entry rescue, and use of external emergency services, and explains why relying solely on public emergency services is often inadequate for confined space rescue. It is important to note here, some jurisdiction such as British Columbia require organizations that rely on public emergency services such as fire departments have a written agreement between them and the fire department for the provision of emergency rescue services.
- **Rescue equipment awareness:** Module 4 outlines the common rescue and retrieval equipment (tripods, winches, harnesses, lifelines, breathing apparatus) and describes their purpose and basic limitations.
- **First response actions:** The course provides an overview of the actions for attendants and workers in the event of an alarm, loss of communication, or

observed distress of an entrant e.g., not entering without proper rescue procedures, etc.

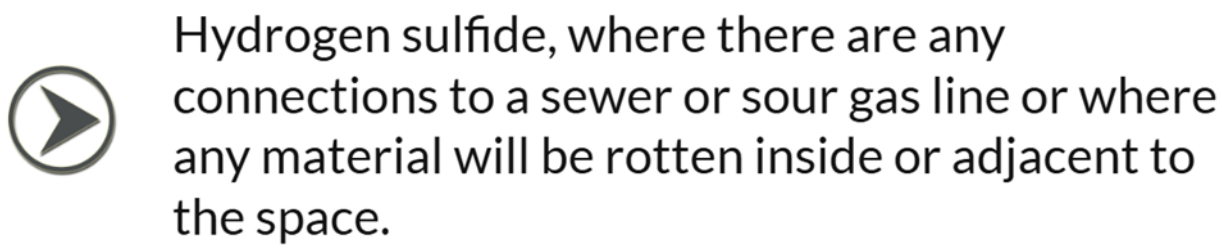
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8. Documentation, competency, and refresher training

- **Documentation and records:** The course goes over the documentation required for confined space work (inventories, assessments, permits, training records, equipment inspections, emergency drills) and explains why accurate records are critical for compliance and due diligence.
- **Competency and training intervals:** Most jurisdictions use the terms of "competent person" or "qualified person" in legislation/standards. The course discusses the need for employers to ensure their workers are proficient and qualified. Regardless of the terms that legislation may use, proficient and competent are synonymous. As far as retraining or refresher intervals the course notes it should be done as frequently as required by jurisdiction or employer.

Non-Technical Points

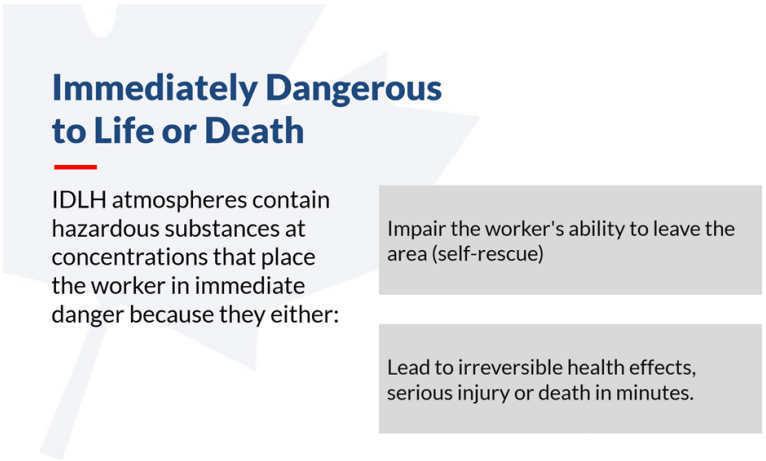
~~**Module 3 Slide 24 :**~~



~~The term should be rotting, or consider that H2S is a byproduct of decomposition, maybe say there may be decomposing material inside.~~

This slide has been corrected.

Module 3 Slide 41:



~~IDLH means Immediately Dangerous to Life or Health. Both the slide and the narration need to be corrected.~~

Has been fixed

Conclusion

After correcting the points mentioned in this report, it is the opinion of the writer the eSafetyFirst Canada Confined Space Online Training course will meet the requirements as set out CSA Z1006-16 and the different provinces with the exception of Newfoundland and Labrador.



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References

Confined Space – Program
https://www.ccohs.ca/oshanswers/hsprograms/confinedspace/confinedspace_program.html

Confined Spaces

https://www.ccohs.ca/topics/hazards/workplace/confinedspaces

CSA Z1006-16 Management of work in confined spaces

https://scc-ccn.ca/standardsdb/standards/4028427

CSA Z1006-16: The standard for confined spaces

https://www.spi.com/en/blog/standards-regulations/csa-z1006-16-new-version-standard-for-confined-spaces