

Act Review Submission – Confined Spaces

It was recently brought to my attention that legislation is being reviewed this year, and I have one topic that I think is really important to address...confined spaces.

In Manitoba's current legislation, the definition for confined space reads:

"confined space" means an enclosed or partially enclosed space that
(a) except for the purpose of performing work, is not primarily designed for human occupancy;
and
(b) has restricted means of access or egress

This is a very vague definition for a subject that can have such a huge impact. Too much is left for interpretation, and everyone tends to interpret it differently. According to this definition, I once had an argument that my basement could be considered a confined space since it only has one narrow stair case with no windows or other points of exit.

Other provinces have taken further measures in confined space designation. I have attached a file which refers to confined spaces in Alberta. The first thing I notice is the addition of "restricted access areas," as well as "confined spaces." They have included a flow chart that clearly indicates whether a space is a restricted access space or a confined space. In addition, they list the different precautions that should be taken for either type of space.

I have also included information from Ontario's legislation. Similar to Alberta's flow chart, they have included some simple yes or no questions to determine if the space is a confined space or not.

As a COR certified business owner, I hold the safety of my employees and others to the highest regard. With that being said, I do not like the fact that resources and manpower are wasted or misguided at job sites over areas that are improperly designated as confined spaces.

Thank you for your time, and if you have any questions, please feel free to contact me at your soonest convenience.

Thank you,

P.S. In addition to the above noted, it has always bothered me that on page 68 of the act and regulations, 22.28-22.30 in the Contents of the regulation has a spelling error. "Powered *life* trucks" is typed instead of "Powered *lift* trucks."