



St. John Ambulance

SAVING LIVES
at work, home and play

July 31, 2017

Review of The Workplace Safety and Health Act
c/o Chair, The Advisory Council on Workplace Safety and Health
Workplace Safety and Health
200-401 York Avenue
Winnipeg, MB R3L 2G8

To Whom it may concern:

As Manitoba's leader in First Aid, CPR and AED training, we are pleased to provide our comments on the review of Manitoba's Workplace Safety and Health Act, and in particular to Section 5 of the regulations.

St. John Ambulance has considerable expertise and experience in providing lifesaving training to Manitoba's workplaces, and has been doing so since 1911. Our extensive knowledge positions our organization to be the gold standard for First Aid, CPR & AED training in Manitoba, and makes us a credible voice in this review process.

Since 2014, St. John Ambulance has participated in the development of a national standard for First Aid and CPR in the workplace, which standard has now been issued and is known as **CSA Z1210-17**, and more recently, a standard has been issued for workplace first aid kits and is known as **CSA Z1220-17**. St. John Ambulance was one of 36 participants on the CSA Technical committee, whose membership came from across Canada and included representatives from government, worker insurance boards, training agencies, labour, employer's, health care and school boards.

The creation of a CSA standard allows the opportunity to harmonize first aid competencies, content, and training across Canada, and allows for all workers, regardless of where they are employed, from benefiting from best practices. St. John Ambulance endorses and fully embraces this important initiative.

Northwest Territories, Manitoba & Nunavut | One St. John Ambulance Way, Winnipeg, MB Canada R3G 3H5

sja.ca

Charitable Registration No.: 123226110 RP0001

St. John Ambulance is an international humanitarian organization and is a foundation of the Order of St. John



It would be the recommendation of St. John Ambulance Manitoba that The Province of Manitoba amend Part 5 of the WPSH Act to adopt both CSA standards mentioned above with one additional consideration.

The CSA Standard for First Aid Training in the Workplaces **CSA Z1210-17** provides for minimum times to be spent on practical training, but does not do likewise with the theoretical or knowledge part of the course. Our understanding is that times frames for the non-practical part of the course were deliberately omitted to allow training agencies to tailor the course to the requirements of the learners. While this may work well in theory, our experience is that minimum times need to be clearly laid out to ensure that all competencies are achieved. We have not doubt that should this not be done, some trainers will minimize or eliminate all together the time required to fully establishing this part of the required competency.

Based on the above we would recommend that the Province of Manitoba adopt both CSA Z1210-17 and CSA Z1210-17, but also mandate that the minimum hours for theoretical or knowledge training must be no less than what the standard requires for practical skill training.

We would be pleased to provide further information if you so desire. Thank you for allowing us to participate in this process.

Yours truly,

Brent Fowler
Chief Executive Officer

Richard Fetherston
Director of Training & Operations