

December 4, 2025

Occupational Health and Safety Regulations Review
Corporate Services Division
Ministry of Labour Relations and Workplace Safety
300–1870 Albert Street
Regina, SK S4P 4W1
Email: legislation.labour@gov.sk.ca

Re: Submission from the North Saskatoon Business Association on the Review of The Occupational Health and Safety Regulations, 2020 (Parts 1–5)

To Whom It May Concern,

On behalf of the NSBA – Saskatoon’s Business Association and our more than 700 member businesses across Saskatoon and northern Saskatchewan, we appreciate the opportunity to provide feedback on the Ministry’s review of *The Occupational Health and Safety Regulations, 2020*. Our members represent a diverse cross-section of the regional economy, including construction, professional services, manufacturing, retail, hospitality, transportation, and emerging sectors.

We support the Ministry’s intent to modernize the regulations, improve clarity, and ensure that workplace safety rules reflect current industry practices and technological advancements. Saskatchewan businesses are committed to maintaining safe and healthy workplaces, and clear, practical regulations are essential to achieving that shared goal. Below, we provide feedback on the topics identified in the discussion paper, with a focus on balancing enhanced safety with regulatory predictability and economic competitiveness.

1. Notifications to the Ministry

We support the modernization of definitions for “serious injury,” recognizing that hospital admission practices have changed. Clarity is important; however, any expansion of reporting requirements should be paired with clear guidance, practical timelines, and simple reporting tools to prevent administrative overload—particularly for small and medium enterprises (SMEs). Regarding the 14-day notice for high-risk asbestos work, we ask the Ministry to consider operational realities. Construction and renovation work often requires quick mobilization, and long notification timelines can delay projects and increase costs. Greater flexibility or alternate pathways for expedited approval would support both safety and economic activity.

2. Youth Employment

The NSBA supports efforts to improve safety outcomes for young workers. However, we encourage the Ministry to ensure that any updated restrictions or prescribed workplaces are evidence-based and do not unintentionally restrict access to entry-level employment in sectors such as hospitality, service, retail, and the trades sectors already facing significant labour shortages.

Clear, accessible resources for employers would help ensure compliance and understanding of youth employment rules.

3. Occupational Health and Safety Program Requirements

The NSBA encourages caution when considering changes to thresholds or expanding prescribed industries. If the threshold for requiring formal OHS programs is lowered below 10 workers, this would impose significant administrative and financial burdens on small businesses that often lack dedicated HR or safety personnel.

We recommend maintaining the current threshold or exploring alternative models—such as simplified or scaled OHS program templates—that support compliance without imposing disproportionate burdens.

4. Employers' Duty to Investigate Accidents

We support clarity and consistency in investigation requirements. If the threshold for mandatory investigations expands, we encourage the Ministry to provide standardized templates, examples, and training resources to reduce administrative pressure on businesses without compromising safety outcomes.

5. Interference at the Scene of an Accident

We recognize the importance of preserving the scene of an accident for investigative purposes. However, we encourage the Ministry to ensure response times for occupational health officers are timely to minimize operational shutdowns, particularly in sectors like construction and manufacturing where site delays can be costly.

6. Working Alone or in Isolation

Working-alone provisions are especially impactful for small retailers, gas stations, restaurants, home-care providers, and late-night businesses. Enhancing safety for isolated workers is essential; however, mandatory measures should remain flexible and scalable.

The NSBA recommends:

- Clear, outcome-based requirements rather than prescriptive mandates
- Avoiding policies that effectively require additional staffing for small businesses
- Allowing technological solutions (monitoring apps, check-in systems) to meet compliance

7. Harassment and Violence

We recognize the importance of strengthening harassment and violence prevention. Many businesses, particularly SMEs, will require support to meet expanded obligations around policies, investigations, and documentation. We recommend:

- Clear templates for compliant policies
- Training resources accessible to small employers
- Reasonable timelines for implementation

This will ensure meaningful compliance without overwhelming smaller workplaces.

8. Occupational Health Committees and Representatives

We encourage the Ministry to maintain clarity around committee responsibilities while avoiding increased administrative burdens. If committee duties or meeting requirements expand, this will disproportionately affect mid-sized businesses.

We recommend:

- Retaining the 10-worker threshold
- Allowing flexibility in meeting frequency based on risk level
- Keeping employer responsibility for ensuring meetings occur, paired with simplified recordkeeping tools

9. Harmonization of First Aid Requirements

We support interjurisdictional harmonization efforts, which improve labour mobility and reduce confusion for employers operating in multiple provinces.

However, adopting CSA Z1210-17 may increase training costs and frequency of recertification. The Ministry can support businesses by:

- Allowing a reasonable phase-in period
- Providing guidance on equivalencies between existing training and new standards
- Avoiding unnecessary duplication of training for experienced first aiders

Updates to first aid room requirements should reflect actual risk and workplace realities rather than arbitrary worker counts.

The NSBA supports the Government of Saskatchewan's intent to modernize OHS regulations in ways that enhance worker safety while maintaining a competitive and predictable business environment. Throughout this review process, we encourage the Ministry to prioritize clarity, scalability, and consistency, ensuring that updates are both practical for employers and protective of workers.

We thank you for allowing our input to advocate for policies that ensure Saskatoon remains a competitive and prosperous place to do business.

Sincerely,



Keith Moen
Executive Director, NSBA