

Wood Dust Mitigation and Control Policy Backgrounder for Implementation

On July 19, 2014 the WorkSafeBC Board of Directors approved new Policies that impose obligations with respect to combustible dust. The Policies create obligations on employers in the sawmill and wood product manufacturing sectors to undertake a combustible dust risk assessment, implement a dust management program and perform an audit of the program as soon as reasonably possible following the implementation of the program. The Policies also create corresponding obligations on supervisors and workers to comply with the employer's dust management program. These Policies become effective September 1, 2014.

These Policies have built on the experience of the past several years as both WorkSafeBC and industry have developed a more comprehensive approach to the management of combustible wood dust hazards. The Policies provide an improved regulatory framework for WorkSafeBC to engage with employers with respect to their management of combustible wood dusts.

WorkSafeBC is planning an inspectional outreach to industry through the fall of 2014. This outreach is intended to assist in transitioning to the new framework as well as to support robust and sustainable wood dust management practices that will ensure worker safety over the long term.

WorkSafeBC Implementation of the Policies – Overview

WorkSafeBC's previous inspection processes have shown that many employers have functioning dust management programs and are actively engaged in managing combustible wood dust. Those employers may only need some minor improvements or modifications to their programs. Other employers continue to have challenges in managing combustible wood dusts. WorkSafeBC's implementation plan will be flexible to accommodate the needs of both groups of employers.

WorkSafeBC's approach to industry engagement will be as follows:

- Sawmill employers that were in compliance in the previous round of inspections will have the option of either engaging in a program of independent inspection and reporting or choosing to have WorkSafeBC continue to perform random, focused inspections.
- Sawmill employers that received stop work orders or penalties in the previous round of inspections will be required to either engage in daily inspections by an independent, qualified third party with weekly reporting to WorkSafeBC, or be subject to ramped up inspections by WorkSafeBC.
- Other wood product manufacturers and pellet mills currently require more direct support, and will be subject to a program of regular inspections by WorkSafeBC officers.

WorkSafeBC Next Steps

The overview of WorkSafeBC's plan is as follows:

Mid August	Employers will be sent a letter outlining the options available to them, and providing links to finalized policies, guidelines and toolbox materials
Mid September to early October	WorkSafeBC Safety Officers will engage in consultative site visits with each sawmill employer to consult on the new Policies and to discuss inspection options.
Mid September	Inspection program in wood product manufacturing and pellet mills commences
Late October	Inspection options finalized with sawmill employers, inspection program begins

FAQs

Q: What is the compliance standard for these Policies?

A: The compliance standard that employers will be expected to meet will reflect the performance based nature of the obligations in the Policies. The focus will be on the adequacy of the risk assessment, the dust management program and the audit. The expectation will be that employers will ensure worker safety by identifying risks from combustible wood dust and effectively managing those risks. The presence of dust in excess of acceptable limits may indicate noncompliance if that accumulation was not identified in the risk assessment or not adequately accounted for in the dust management plan.

Q: When will supporting material be available?

A: Material relating to combustible dust management is already available on the WorkSafeBC.com website, as well as through the Fire Inspection and Prevention initiative. A Combustible Dust Resource Toolbox and a revised OHS Guideline G5.81 will be available at the time the letter is sent to employers in mid August.

Q: Will there be a scalable audit available for smaller employers?

A: The BC Forest Safety Council is working with Independent Wood Processors on a scalable audit for smaller employers and with the Wood Pellet Association on an audit tool specific to the pellet industry. More information on the progress of the scalable audit will be available by the end of August.