Ontario OHSA Compliance Checklist

Employer self-assessment · Includes the 2026 changes

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Organization: _____ Workplace / project: _____

Completed by: _____ Date: _____

2026 CHANGES

CHANGE	IN FORCE	APPLIES TO	REGULATION
AED on construction projects	Jan 1, 2026	Constructors	O. Reg. 213/91 s.27.1, added by O. Reg. 157/25
Washroom cleaning records	Jan 1, 2026	Constructors and all employers	O. Reg. 480/24 (OHSA s.23.1(2), s.25.3(3))
Procurement equivalency and penalties	Jan 1, 2026	Public construction procurement	O. Reg. 364/25, O. Reg. 365/25
WSIB AED reimbursement	Purchases Jul 1, 2025 to Jun 30, 2027	Constructors	O. Reg. 360/25
CSA-approved respirators accepted	Jul 1, 2026	Employers using respirators	O. Reg. 113/26 (amends Reg. 833 s.10)

1. ADMINISTRATIVE MONETARY PENALTIES · O. REG. 365/25

- ☐ Public-sector buyers: aware that an inspector can impose a penalty **without going to court** for a breach of s.3 of O. Reg. 364/25 (the lesser of $100,000 and 10% of the contract value)
- ☐ Aware the Minister may publish the **name** of a person who receives an administrative penalty

This is the only penalty the regulation currently prescribes. It is not a general penalty regime for employers.

2. PROCUREMENT AND OHS-SYSTEM EQUIVALENCY · O. REG. 364/25

- ☐ Confirmed whether the rule applies to the work you bid on: it covers **construction procurement only**, by the Province and listed public bodies
- ☐ Your COR 2020 or ISO 45001 certification is current and audit-ready
- ☐ You know those buyers must treat all Chief Prevention Officer-accredited OHS systems as **equivalent** (as of October 2025: ISO 45001:2018, CSA Z45001-19, IHSA COR 2020, RC14001:2023 and RCMS:2023)
- ☐ You are not paying for duplicate certifications to satisfy a single construction tender
- ☐ Certificates and audit reports are ready to submit with bids

3. ON-SITE AED, CONSTRUCTION · O. REG. 157/25

- ☐ Assessed whether the project runs **3+ months** with **20+ workers** regularly employed (AED required when both apply)
- ☐ AED plus the required accessories on site: 1 CPR mask, 1 pair of scissors, 2 pairs of disposable medical-grade gloves, 1 disposable razor, 1 garbage bag, 4 absorbent towels
- ☐ A CPR/AED-trained worker is present whenever work is in progress
- ☐ AED location is signed, and listed in the site emergency response plan (signage is required; the plan entry is good practice)

Quarterly inspection and record rules: see the Ontario AED construction checklist.

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Sections 4 to 8 and score

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4. WSIB AED REIMBURSEMENT · O. REG. 360/25

- [ ] AED was purchased between **July 1, 2025** and **June 30, 2027**
- [ ] Proof of purchase and a copy of the project's approved notification form under O. Reg. 213/91 s.6(3) (or the ministry project number) are kept for the application
- [ ] Reimbursement claim (up to **$2,500**) submitted by **July 31, 2027**
- [ ] Aware reimbursement is limited to one defibrillator per project

5. NALOXONE KITS, AT-RISK WORKPLACES · OHSA S.25.2, IN FORCE JUNE 1, 2023

- [ ] Assessed whether your own workers are at risk of an opioid overdose at work
- [ ] If at risk: at least one naloxone kit is provided on site
- [ ] Assigned worker(s) trained to recognize overdose and administer naloxone
- [ ] The risk assessment is documented even where a kit is not required

6. WASHROOM CLEANING RECORDS · O. REG. 480/24

- [ ] Confirmed the requirement applies to you: constructors (s.23.1(2)) **and all employers** (s.25.3(3)), not construction only
- [ ] A cleaning record is maintained for each washroom facility
- [ ] The **date and time of the two most recent cleanings** are recorded
- [ ] The record is posted at or near the washroom, or posted electronically with directions to workers on how to find it
- [ ] Cleaning responsibility is assigned and understood

7. RESPIRATORS AND PPE · O. REG. 113/26, IN FORCE JULY 1, 2026

- [ ] **CSA-approved respirators** are accepted alongside NIOSH-approved ones (Reg. 833 s.10)
- [ ] Respirator fit-testing is current. Reg. 833 s.12 requires a fit test but sets no interval; the 2-year interval comes from CSA Z94.4, not Ontario law
- [ ] Construction head protection reviewed for O. Reg. 112/26 (from July 1, 2027: CSA Z94.1 or ANSI Z89.1 headwear, Type 2 where there are side-impact hazards)
- [ ] PPE purchasing specifications are reviewed as standards change

8. GENERAL DUE-DILIGENCE FOUNDATIONS · OHSA

- [ ] OH&S policy is current, signed, and posted (6+ workers)
- [ ] Workplace harassment and violence programs are in place and reviewed
- [ ] A JHSC or health & safety representative is established and meeting
- [ ] Training records and incident / near-miss reporting are up to date

YOUR COMPLIANCE SCORE

Applicable checks completed: _____ / 32 Checks that do not apply: _____

SCORE	RATING	WHAT TO DO
28–32	On track	Keep records current and re-check after each regulation change.
20–27	Minor gaps	Assign an owner and a date to each unchecked item.
Below 20	Action needed	Start with the items required by regulation that apply to you.

Sections 1 to 4 apply to construction work or construction projects. Sections 5 to 8 can apply to any workplace; section 6 applies to all employers. Subtract items that do not apply and score the rest. Bands are proportional (about 87% and 63%).

Want help applying this?

Our consultants (CRSP Certified · COR & ISO 45001 Lead Auditors) can adapt this to your workplace or review your safety program with you.

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Ontario OHSA Compliance Checklist · Version 2.0 · Reviewed October 2026 · HSE Advisor Canada. Free to use and adapt. General guidance, not legal advice.

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