

Recommendations for Modernizing Manitoba Workplace Safety and Health Regulations

Executive Summary

This report provides recommendations to update Manitoba Workplace Safety and Health Regulation 217/2006 to align with current CSA standards terminology and safety requirements. Two primary areas require immediate attention: modernizing terminology for aerial work platforms (Part 28) and updating fall protection standards for Self-Retracting Devices (Part 14).

1. Mobile Elevating Work Platforms (MEWP) Terminology Update

Current Regulation Status

Manitoba Regulation 217/2006, **Part 28, Sections 28.37-28.44** currently references outdated CSA standards and terminology:

Section 28.37(1) requires compliance with:

- CAN/CSA Standard-B354.1-04, Portable Elevating Work Platforms
- CAN/CSA Standard-B354.2-01 (R2006), Self-propelled Elevating Work Platforms
- CAN/CSA Standard-B354.4-02, Self-propelled Boom-Supported Elevating Work Platforms
- CSA Standard C225-00 (R2005), Vehicle-Mounted Aerial Devices

The regulation uses the term "**self-elevating work platform**" throughout Part 28, which is inconsistent with modern industry standards.

Recommended Changes

Update Section 28.37(1) to reference:

CSA Z354:18 - Mobile Elevating Work Platforms (MEWPs) - Design, Calculations, Safety Requirements and Test Methods

This consolidated standard replaces the previous B354 series and adopts the internationally recognized terminology "**Mobile Elevating Work Platform (MEWP)**"[1][2].

Recommended regulatory language:

"An employer must ensure that a mobile elevating work platform (MEWP) used at a workplace is designed, constructed, installed, maintained, used and dismantled in accordance with CSA Z354:18 - Mobile Elevating Work Platforms - Design, Calculations, Safety Requirements and Test Methods."

Rationale for Change

- The term "MEWP" is the current CSA standard terminology and aligns with international ISO standards
- CSA Z354:18 consolidates multiple previous standards into a single comprehensive document
- The 2018 standard provides updated safety requirements reflecting modern equipment design and hazard mitigation
- Industry training programs have transitioned to MEWP terminology, creating regulatory confusion with outdated references
- Equipment manufacturers now label and certify products to MEWP standards rather than legacy classifications

Implementation Considerations

Affected Sections requiring terminology updates:

- Section 28.37 (Standards re self-elevating work platforms)
- Section 28.38 (Guarding)
- Section 28.39 (Fall protection)
- Section 28.40 (Maintenance, records and manuals)
- Section 28.41 (Signs)
- Section 28.42 (Climbing prohibited)
- Section 28.43 (Use of the self-elevating work platform)
- Section 28.44 (Inspection)

Definition amendment required in Part 1 (Definitions):

Replace: *"self-elevating work platform" means a work platform that can be self-elevated, and includes a boom-type elevating work platform and one that rolls or is self-propelled.*

With: *"mobile elevating work platform (MEWP)" means a work platform with extending structure and/or elevating platform for moving persons to working positions where they can carry out work from the platform, with all controls, structures, and chassis comprising an integral unit, and includes portable, self-propelled, and boom-supported elevating work platforms.*

2. Self-Retracting Device (SRD) Standards Update

Current Regulation Status

Manitoba Regulation 217/2006, **Part 14 (Fall Protection)**, does not specifically reference current CSA standards for Self-Retracting Devices. Section 14.13 addresses fall arrest systems but lacks specific references to SRD standards[3].

Section 14.13(1) requires fall arrest systems to be designed in accordance with:

- CSA Standard Z259.16-04, Design of Active Fall-Protection Systems

- CSA Standard Z259.13-04, Flexible Horizontal Lifeline Systems

No specific reference exists for Self-Retracting Devices despite their widespread use in Manitoba workplaces.

Recommended Changes

Add new subsection to Section 14.13 specifically addressing Self-Retracting Devices:

Section 14.13(5) *When a self-retracting device (SRD) is used as part of a fall arrest system, an employer must ensure that the device:*

1. *Meets the requirements of CSA Z259.2.2-17, Self-Retracting Devices for Personal Fall-Arrest Systems*
2. *Is classified and used according to its intended application:*
 - *Class SRL: overhead anchorage applications*
 - *Class SRL-R: overhead anchorage with integral rescue capability*
 - *Class SRL-LE: leading edge and foot-level anchorage applications*
 - *Class SRL-LE-R: leading edge applications with integral rescue capability*
3. *Is selected based on the anchorage position relative to the user's dorsal D-ring and potential contact with edges or surfaces during fall arrest*
4. *Undergoes revalidation at intervals specified by the manufacturer and based on duty classification (infrequent/light, moderate/heavy, or severe/continuous use)*
5. *Includes a swivel connection at the lifeline termination point*

Rationale for Change

Critical safety improvements in CSA Z259.2.2-17:

- **Reclassification system:** Replaces outdated Type 1, 2, and 3 classifications (based solely on length) with performance-based Classes (SRL, SRL-R, SRL-LE, SRL-LE-R) that reflect actual use conditions[4][5]
- **Leading edge protection:** Class SRL-LE devices provide enhanced protection when anchorage is below the user or when

lifeline contact with edges is possible—a common scenario in construction and maintenance work

- **Integral rescue capability:** Class R devices include assisted rescue mechanisms, addressing Manitoba's emergency response requirements under Section 28.2(2)
- **Revalidation requirements:** Mandatory manufacturer inspection at duty-specific intervals improves equipment reliability and worker protection
- **Average deployment force:** New standard evaluates deceleration characteristics, not just maximum arrest force, providing better protection against injury
- **Mandatory swivel requirement:** Prevents lifeline twisting that can compromise device performance

Implementation Considerations

Additional reference update for Section 14.14 (Fixed support system requirements):

Current anchorage requirements (22.2 kN minimum) remain appropriate but should clarify compatibility with SRD classifications. Add note:

"When used with Class SRL-LE or Class SRL-LE-R devices in foot-level or leading edge applications, anchorage systems must meet the specific requirements of CSA Z259.2.2-17 for the intended device classification."

3. Implementation Timeline Recommendations

Phase	Action Items
Phase 1 (Immediate)	Stakeholder consultation with industry, employers, and training providers
Phase 2 (6 months)	Draft regulatory amendments incorporating terminology and standard updates
Phase 3 (12 months)	Publish proposed amendments for public comment period
Phase 4 (18 months)	Finalize and enact regulatory amendments
Phase 5 (24 months)	Transition period allowing compliance with either old or new standards
Phase 6 (36 months)	Full compliance required with updated standards

Table 1: Recommended implementation timeline for regulatory updates

4. Training and Education Requirements

Upon implementation, Manitoba should ensure:

- SAFE Work Manitoba updates training program standards to reflect MEWP terminology and CSA Z354:18 requirements
- Fall protection training incorporates CSA Z259.2.2-17 classification system and selection criteria
- Competent person training includes SRD revalidation interval determination based on duty classification
- Public awareness campaign educates employers and workers on terminology changes and enhanced safety requirements

Conclusion

Updating Manitoba Regulation 217/2006 to incorporate modern MEWP terminology and current SRD standards will align provincial regulations with national safety standards, reduce confusion in training and equipment selection, and enhance worker protection. The recommended changes reflect industry best practices and

technological advances in fall protection and aerial work platform design.

Implementation of these recommendations will position Manitoba as a leader in workplace safety regulation modernization while maintaining consistency with other Canadian jurisdictions and international standards.

References

- [1] Standards Council of Canada. (2024). Mobile elevating work platforms - Design, calculations, safety requirements and test methods. CSA Z354:18. <https://scc-ccn.ca/standards/notices-of-intent/csa-group/mobile-elevating-work-platforms-design-calculations-safety>
- [2] IPAF. (2019). CSA Standards Dealer Guidance. International Powered Access Federation. [https://www.ipaf.org/sites/default/files/2019-02/IPAF CSA Standards Dealer Guidance \(TE-731-0219-2-en-CA\).pdf](https://www.ipaf.org/sites/default/files/2019-02/IPAF%20CSA%20Standards%20Dealer%20Guidance%20(TE-731-0219-2-en-CA).pdf)
- [3] Province of Manitoba. (2022). Workplace Safety and Health Regulation 217/2006, Part 14 - Fall Protection. https://www.gov.mb.ca/labour/safety/pdf/whs_workplace_safety_act_and_regs.pdf
- [4] MSA Safety. (2024). Revision highlights to CSA Z259.2.2-17 for self-retracting devices. <https://blog.msasafety.com/revision-highlights-to-csa-z259-2-2-17-for-self-retracting-devices/>
- [5] SPI Health and Safety. (2026). CSA Z259 standards for fall arrest self-retracting lanyard has changed. <https://www.spi.com/en/blog/standards-regulations/csa-z259-standards-for-fall-arrest-self-retracting-lanyard-has-changed>