

JHA Month, June 2026

# Know Before You Go.

June is Job Hazard Analysis Month at OMHAS

Summer is here. The work is running at full speed. Outdoor crews are on site. Subcontractors are moving in and out of your facility. Students and new workers are on the floor. The weather is hot, the days are long, and everyone is busy.

And this is exactly when the hazard assessment does not get done.

Not because anyone is careless. But because summer is the season of momentum. Things are moving. Schedules are tight. The job needs to get done today. And somewhere in that momentum, someone steps into a trench that was never assessed, or reaches into a machine that was never guarded, or walks onto a site where nobody told them what the hazards are.

June is the month we want to talk about three things that belong together: Job Hazard Analysis, heat stress as a summer hazard that must be part of every JHA, and the duty to communicate hazards to every subcontractor and visitor who sets foot on your site.

Read this newsletter. Complete the checklist. File it as a due diligence record. And if a subcontractor is coming onto your site this summer, make sure they know what they are walking into before they arrive.



*"The employer who cannot produce a JHA when something goes wrong is an employer with very little legal protection."*

## What Is a Job Hazard Analysis?

A Job Hazard Analysis (JHA) is a structured process for identifying the hazards associated with a specific task before that task is performed. Also called a Job Safety Analysis or Task Hazard Assessment.

You identify the task. You break it into steps. For each step, you ask: what could go wrong? What is the hazard? What is the likely outcome? And then you identify the controls to eliminate or reduce that hazard before the work begins.

A JHA is not a form filled out after the work is done. It is a thinking exercise that happens before anyone picks up a tool, enters a space, or begins a task for the first time or under new conditions.

In summer, new conditions are everywhere: heat, humidity, outdoor environments, changing site configurations, new workers, and subcontractors unfamiliar with your hazards. Every one of these is a reason to conduct a JHA before the work begins.

Heat Stress, Foreseeable. Controllable. Required.

# Heat Stress Is a Foreseeable Hazard. Treat It Like One.

Every summer JHA must include heat. The law already requires it.

Every summer, workers across Canada are injured or made ill by heat stress. The symptoms range from heat cramps and heat exhaustion to heat stroke, which can be fatal. And every summer, employers are surprised when it happens, because heat does not feel like a workplace hazard. It feels like weather.

But heat is a foreseeable hazard. It follows a predictable seasonal pattern. It is known to affect workers in construction, agriculture, transportation, landscaping, food production, warehousing, and dozens of other industries.

*"Heat is a foreseeable hazard. It follows a predictable seasonal pattern. It must be assessed and controlled."*

Canadian workers' compensation boards accept hundreds of heat-related injury claims every year, with the highest numbers in transportation, public works, construction, food services, and film and television production. These are not freak events. They are predictable outcomes of foreseeable conditions that were not adequately assessed and controlled.

## What the Law Already Requires

There is currently no standalone heat stress regulation in most Canadian provinces. But under the general duty clause in every provincial OHS Act, employers must take every reasonable precaution to protect workers from known and foreseeable hazards. Heat in summer is both.

Bill 222, the Heat Stress Act, 2024, received its first reading in the Ontario legislature in November 2024 and has been ordered for second reading. If passed, it would require employers to create heat stress policies, conduct heat stress assessments, and provide workers with protective equipment and cool drinking water. The law is moving in this direction. The employers who act now are ahead of it.



## What a Heat Stress JHA Looks Like in Practice

When you conduct a JHA for a summer outdoor task, your heat stress assessment should identify the following controls before the work begins.

- 1 Water.** Cool drinking water must be accessible at or near every outdoor work area. Workers should drink regularly, not just when thirsty.
- 2 Rest.** Scheduled rest breaks in shaded or cool locations must be built into the work plan before the day starts.
- 3 Shade.** Where shade is not naturally available, temporary shaded rest areas must be provided.
- 4 Acclimatization.** Workers new to outdoor work or returning after time away need a graduated introduction to working in heat. Full workload in week one is not appropriate.
- 5 Monitoring.** Supervisors must know the signs of heat exhaustion and heat stroke and must actively monitor their crews. Workers must know how to report symptoms without fear.
- 6 Emergency response.** If a worker collapses from heat, everyone on site needs to know what to do in the next sixty seconds. That procedure must exist before the day begins.



Subcontractor Duty, Show Me the Fines

# Your Site. Your Hazards. Your Responsibility.

Three cases. Three JHA failures. One message.

When a subcontractor comes onto your site, they bring their own tools, their own crew, and their own procedures. But they step into your hazards. And those hazards are your responsibility to communicate.

Under occupational health and safety legislation across Canada, the prime contractor or employer who controls a worksite has a duty to ensure that every person present, whether their employee or not, is made aware of any hazard that could affect them. When a subcontractor is injured by a hazard they were never told about, the prime contractor bears the consequences.

*"Your hazards must be communicated to every person who steps onto your site before they begin work."*

Know your hazards. Document them. Communicate them to every person and every company who enters your site before they begin their work. Get written confirmation. File it.

### Case One. Kingsville, Ontario. July 2023. Convicted September 2025.

A worker at a produce facility was critically injured while operating a machine used to roll and sanitize grow nets. Misalignment of the nets during operation was a normal, recurring occurrence that required workers to reach in and adjust them by hand while the machine was running. No measures, procedures, or guards were in place. The company was fined \$115,000.

Misalignment happened regularly. Everyone knew it. Nobody had ever sat down and asked what would happen when a worker's hand went into a running machine to fix it. That is what a JHA is for.



### Case Two. Leamington, Ontario. November 2022. Convicted July 2024.

Three workers were repairing a stormwater drainage pipe inside a trench more than eight feet deep. The trench walls were inadequately shored, with vertical cuts and no sloping or support structures in place. The trench collapsed and a worker was critically injured. The company pled guilty and was fined \$65,000.

Three workers entered an eight-foot trench with no shoring and no assessment of the collapse hazard. A JHA conducted before anyone stepped in would have identified that hazard in the first thirty seconds.

### Case Three. Edson, Alberta. March 2024. Convicted December 2025.

A welder was seriously injured when a wellhead casing dislodged during cutting at a well abandonment site. The prime contractor was convicted of failing to inform the welding company of the known hazard that the wellhead or its components could become dislodged when the casing was cut. No joint hazard assessment was conducted. No hazard communication took place. The prime contractor knew the hazard. The welder did not. If your site has hazards, and every site has hazards, every person who steps onto that site must be told about them before they begin.

Due Diligence Record, Complete, Sign, and File

# June Readiness Checklist: JHA, Heat Stress, and Subcontractor Duty

Complete this checklist before summer work is fully underway. Sign it. Date it. File it.



## SECTION A: Job Hazard Analysis

<input type="checkbox"/>	Have JHAs been completed for all summer tasks, including tasks performed differently due to heat, outdoor conditions, or changed site configurations?
<input type="checkbox"/>	Are JHAs reviewed and updated when conditions change, new workers are assigned to a task, or an incident or near miss occurs?
<input type="checkbox"/>	Are completed JHAs documented, signed by the supervisor, and filed as part of your due diligence record?
<input type="checkbox"/>	Are workers informed of the findings of the JHA for their assigned task before work begins?
<input type="checkbox"/>	Is there a process for workers to raise hazard concerns identified during the work that were not captured in the original JHA?

## SECTION B: Heat Stress Assessment

<input type="checkbox"/>	Has heat stress been identified as a potential hazard in your JHA for all outdoor and hot indoor tasks?
<input type="checkbox"/>	Is cool drinking water available at or near every outdoor work area before the shift begins?
<input type="checkbox"/>	Are scheduled rest breaks in shaded or cool areas built into the work plan before the day starts?
<input type="checkbox"/>	Is there a written acclimatization plan for new workers and returning workers beginning summer outdoor work?
<input type="checkbox"/>	Do supervisors know the signs of heat exhaustion and heat stroke and are they actively monitoring their crews during hot weather?
<input type="checkbox"/>	Is there a documented emergency response procedure for heat-related illness that every worker on site knows?
<input type="checkbox"/>	Are workers aware that they can report heat stress symptoms without fear of reprisal?

## SECTION C: Subcontractor Hazard Communication

<input type="checkbox"/>	Is there a written subcontractor orientation process that communicates your site-specific hazards before any subcontractor begins work?
<input type="checkbox"/>	Does your subcontractor orientation include summer-specific hazards such as heat stress, outdoor environmental conditions, and any site-specific processes that may affect visiting workers?
<input type="checkbox"/>	Is written confirmation obtained from each subcontractor that they have received and understood the hazard communication?
<input type="checkbox"/>	Are subcontractors required to share their own hazard information with you before work begins, so your workers are aware of any hazards the subcontractor's work may introduce?
<input type="checkbox"/>	Is your Joint Health and Safety Committee or health and safety representative involved in reviewing subcontractor hazard communication procedures?
<input type="checkbox"/>	Are records of subcontractor orientations kept on file and accessible for inspection?

<b>Completed by:</b>	<b>Title:</b>	<b>Date:</b>	<b>Location:</b>
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Due Diligence Record, Complete, Sign, and File

# Your June Action Plan

Complete this checklist before summer work is fully underway. Sign it. Date it. File it.

## What You Can Do Before the End of June

- 1 Pull out your JHA forms right now.**  
**If you do not have them, June is the month to create them. Start with your highest risk summer tasks, outdoor excavation, hot indoor environments, tasks performed by new or returning workers.**
- 2 Add heat stress to every outdoor JHA.**  
It is not optional. It is a foreseeable summer hazard and your general duty requires you to control foreseeable hazards.
- 3 Review your subcontractor onboarding process.**  
Before any subcontractor steps onto your site this summer, confirm that your site hazards have been communicated in writing and that acknowledgment has been received and filed.
- 4 Talk to your supervisors about the signs of heat stroke.**  
Heat stroke is a medical emergency. Supervisors must know this before it happens.
- 5 Call us.**  
Need help building your JHA program?  
Need a heat stress procedure?  
Need a subcontractor orientation process?  
Call OMHAS.



Every one of the cases in this newsletter involved a hazard that was known, or should have been known, before anyone got hurt. A machine that misaligned regularly. A trench with no shoring. A wellhead that could dislodge. A summer sun that was going to be hot.


Managers and supervisors should review high-risk summer tasks together before work begins.


None of these were surprises. They were foreseeable. And foreseeable hazards are controllable hazards. That is the entire point of a Job Hazard Analysis.

Sit down with your supervisor team this month. Walk through your summer tasks. Ask the question a JHA is designed to ask: what could go wrong here? What have we done to make sure it does not?

That conversation, documented and filed, is what keeps your workers safe and your business protected.

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