

March 18, 2014

Distribution List

**ACTIVITY SUMMARY – HAZARD
INVESTIGATION DATED MARCH 14, 2014**

References: A. e-mail from Laura Veldhuyzen to Kirsti MacAulay dated Wed, Mar 12, 2014 10:50 AM
B. Section 10.8, OI Consultant Handbook, dated 28 Feb 14
C. Canadian Centre for Occupational Health and Safety dated Jan 18, 2012. Retrieved Mar 14, 2014 from http://www.ccohs.ca/oshanswers/prevention/contact_len.html
D. e-mail from Adam Pearson to Kirsti MacAulay dated Fri, Mar 14, 2014 12:30 PM

1. A potential hazard was identified and reported at Reference A. Options Inc. (OI) immediately completed a risk assessment in accordance with Reference B and concluded the risk to be **MEDIUM**. A hazard investigation and analysis was initiated.
2. The investigation identified the potential for greater eye damage caused by foreign bodies and chemicals while wearing contact lenses in conjunction with “regular” safety glasses in a client Weld and Paint Shops. More specifically:
 - a. foreign bodies or chemicals such as sparks, splatter, fumes, and hot metal can become trapped in and/or behind both soft and hard contact lenses causing irritation and/or damage to the cornea and complicate removal; &
 - b. chemical splash may be more injurious when both soft and hard contact lenses are worn related to the removal of the lenses. If removal is delayed, first aid treatment may not be as effective and, in turn, the eye's exposure time to the chemical may be increased.
3. As outlined at Reference C, situations have been documented where contact lenses may prevent some substances from reaching the eye, and thus minimize or even prevent an injury. That said, contact lenses are **NOT** a substitute for personal protective equipment (PPE).
4. The OI client confirmed at Reference D that a specific contact lens policy statement does not exist but that they align with and consider CSA Z94.3.1-09 Selection, Use, and Care of Protective Eyewear an industry best practice. CSA Z94.3.1-09 states: “In any environment where industrial eye protection is required, contact lenses **should** not be worn, except under special medical circumstances (in consultation with a qualified medical professional). If individual medical circumstances require that contact lenses be worn in such environments, eye protection must also be used.” OI’s experience is this best practice is not widely known or enforced at the client locations.
5. The Ontario Ministry of Labour does not have directly applicable contact lens safety guidance. The resulting policy “grey zone” means OI and Consultants are equally responsible to ensure the safe use of contact lenses.
6. To mitigate the identified hazard, the following OI administrative controls are established:
 - a. the hazards and the alternatives to wearing contact lenses will be clearly communicated to the OI team for individual consideration and decision on wearing contact lenses via e-mail, team meeting, policy development, and new employee orientation;

- b. identify and record OI contact lens wearers to increase awareness for OI First Aiders, Managers, and Consultants to provide assistance including lens removal and eye irrigation;
 - c. in the absence of client specific contact lens safety policies, OI consultants choosing to wear contact lenses must wear safety goggles that seal to the face in facilities with similar hazards;
 - d. in the absence of client specific contact lens safety policies, OI consultants choosing to wear glasses must wear "over-the-glass" safety glasses in facilities with similar hazards; &
 - e. in the absence of client specific contact lens safety policies, OI consultants choosing to wear prescription safety glasses in facilities with similar hazards must ensure they include permanent side shields in facilities with similar hazards.
7. An interim review and confirmation of the relevant administrative controls will be conducted on-site at the OI client with supporting consultants within the next 10 days.
8. A comprehensive DRAFT contact lens policy will be presented for review at the OI PD training on Apr 17, 2014.



Troy Templeman
Manager
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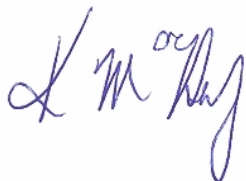
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H&S file

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INVESTIGATION RESULTS REVIEW

- 1. The investigation results were presented for review this day with the originating Consultant, Health & Safety Representative, and OI President in accordance with Reference B. Recommended corrective actions will be implemented and the investigation made available to all Consultants for review.
- 2. An evaluation of the effectiveness of the corrective actions will be conducted in July 2014.



Kirsti MacAulay
President
Options Incorporated