

Prime Contractor

Requirements for Forestry Operations

Interior Safety Conference

April 30, 2026 Kamloops



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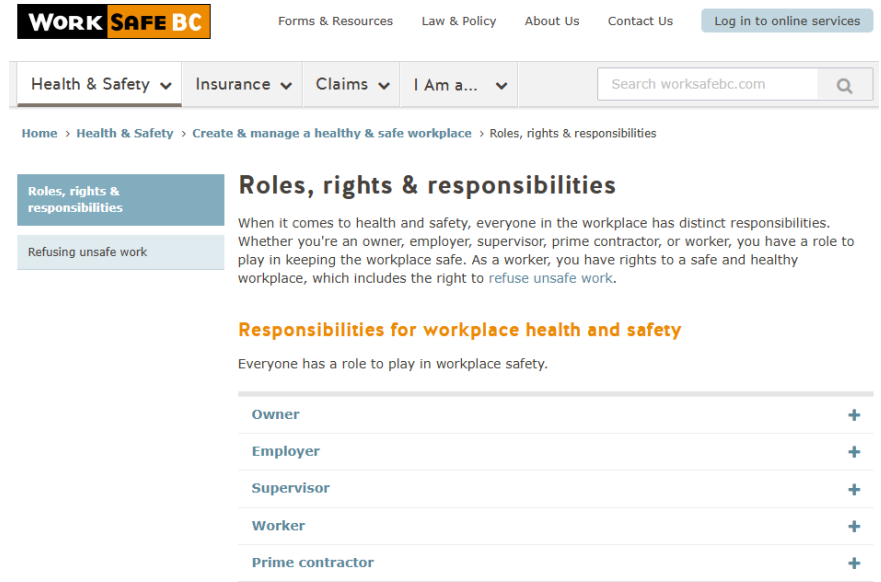
Roles & Responsibilities

Roles & Responsibilities

When it comes to health and safety, **everyone** in the workplace has distinct responsibilities.

Whether you're an owner, prime contractor, employer, supervisor, or worker, you have a role to play in keeping the workplace safe.

WorkSafeBC Webpage: [Roles, rights and responsibilities](#)



The screenshot shows the WorkSafeBC website interface. At the top, there is a navigation bar with the WorkSafeBC logo, links for 'Forms & Resources', 'Law & Policy', 'About Us', 'Contact Us', and a 'Log in to online services' button. Below the navigation bar is a search bar and several dropdown menus for 'Health & Safety', 'Insurance', 'Claims', and 'I Am a...'. The main content area features a breadcrumb trail: 'Home > Health & Safety > Create & manage a healthy & safe workplace > Roles, rights & responsibilities'. A sidebar on the left contains a menu with 'Roles, rights & responsibilities' (highlighted) and 'Refusing unsafe work'. The main heading is 'Roles, rights & responsibilities', followed by a paragraph explaining that everyone in the workplace has distinct responsibilities. Below this is a section titled 'Responsibilities for workplace health and safety' with a sub-paragraph stating 'Everyone has a role to play in workplace safety.' At the bottom, there is a table listing roles with expandable options.

Owner	+
Employer	+
Supervisor	+
Worker	+
Prime contractor	+

Cascading Responsibilities



Responsibilities: Owners/Licensee

- On a worksite, the owner is ultimately responsible for health and safety
- Often, the owner is also the employer
 - If you're both the owner of the workplace and the employer, you must meet your responsibilities for both roles

Owner Responsibilities

- ✓ Maintain the premises in a way that ensures the health and safety of people working on site
- ✓ Disclose to employers or prime contractors the full details of any potential hazards in or around the workplace so they can be eliminated or controlled
- ✓ Comply with occupational health and safety requirements and orders

Responsibilities: Owner/Licensee

OHSR 26.2(1) Planning and conducting a forestry operation

The owner of a forestry operation must ensure that all activities of the forestry operation are both planned and conducted in a manner consistent with this Regulation and with safe work practices acceptable to the Board.

- Start at the layout stage, consider how the block will be harvested without creating additional risks
- Safe Access and Emergency Response should also be considered

Prime Contractor Requirements

Prime Contractor: Designation

OHSR 26.1.1 Prime contractor requirements for forestry operations

If the owner of a forestry operation enters into an agreement referred to in paragraph (a) of the definition of "prime contractor" in section 13 of the Act designating a person to be the prime contractor for a workplace, the owner must ensure that

(a) the person designated:

(i) is qualified to be the prime contractor in respect of that workplace, and

(ii) has the authority necessary to fulfill the responsibilities of prime contractor under the Act, including, without limitation, authority over any employer, worker or other person who may be carrying out the work of the owner at the workplace.

Prime Contractor: “Qualified”

- “Qualified” means being knowledgeable of the work, the hazards involved and the means to control the hazards, by reason of education, training, experience or a combination thereof
- Prime contractors are responsible for coordinating the safety of a workplace
 - applies to all work undertaken on site while they are designated as the prime contractor

Prime Contractor: Written Agreement

- Prime Contractor must be designated in a **written** agreement
- Only **ONE** designated Prime Contractor
- Owner/Licensee must also:
 - give to the prime contractor all information known to the owner that is necessary to identify and eliminate or control hazards to the health or safety of persons at the workplace

Prime Contractor: Written Agreement

- At a multi-employer workplace:
 - The owner designates a prime contractor to coordinate health and safety
 - It's essential to have a written, signed agreement
- Verbal agreements are not valid and can lead to confusion
- Confusion compromises worker safety

Without this written agreement, the owner is the prime contractor

Prime Contractor: Responsibilities

- For most forestry operations, the owner is a licensee that hires a prime contractor to complete projects
 - licensees can range from large forest companies, smaller companies, or individuals that hold tenures or have successfully bid on a tenure such as a Timber Sale Licence
- The overall responsibility for coordination **cannot be transferred** to a subcontractor
 - While tasks can be assigned, the ultimate legal liability rests with the designated prime contractor

OHSR26.1.1 ... the owner must ensure that

(b) not more than one person holds the designation of prime contractor for that workplace at any given time.

Prime Contractor: Responsibilities

- While prime contractors have overall responsibility for health and safety on a worksite, employers still retain responsibility for health & safety of their own workers
- Prime contractor requirements only in place when there is a multi-employer workplace
 - "multiple-employer workplace" means a workplace where workers of 2 or more employers are working at the same time
- Responsibilities of Prime Contractor:
 - ✓ Coordinate the occupational health and safety activities of all employers, workers, and anyone else at the workplace
 - ✓ Establish and maintain procedures to ensure occupational health and safety requirements at the workplace are followed by all parties

Prime Contractor: Responsibilities

- Coordination and procedural requirements:
 - prime contractor must know the work activities and hazards at the workplace, as well as the necessary steps to take to ensure the risks created are effectively controlled
- All subcontractors / employers must notify the prime contractor before starting any activity that is likely to create a hazard for others

OHSR 26.1.2(2) Multiple-employer workplace

Before starting any activity that is likely to create a hazard for an independent operator or a worker of another employer, the person intending to carry out the activity must notify the prime contractor.

Prime Contractor: Planning

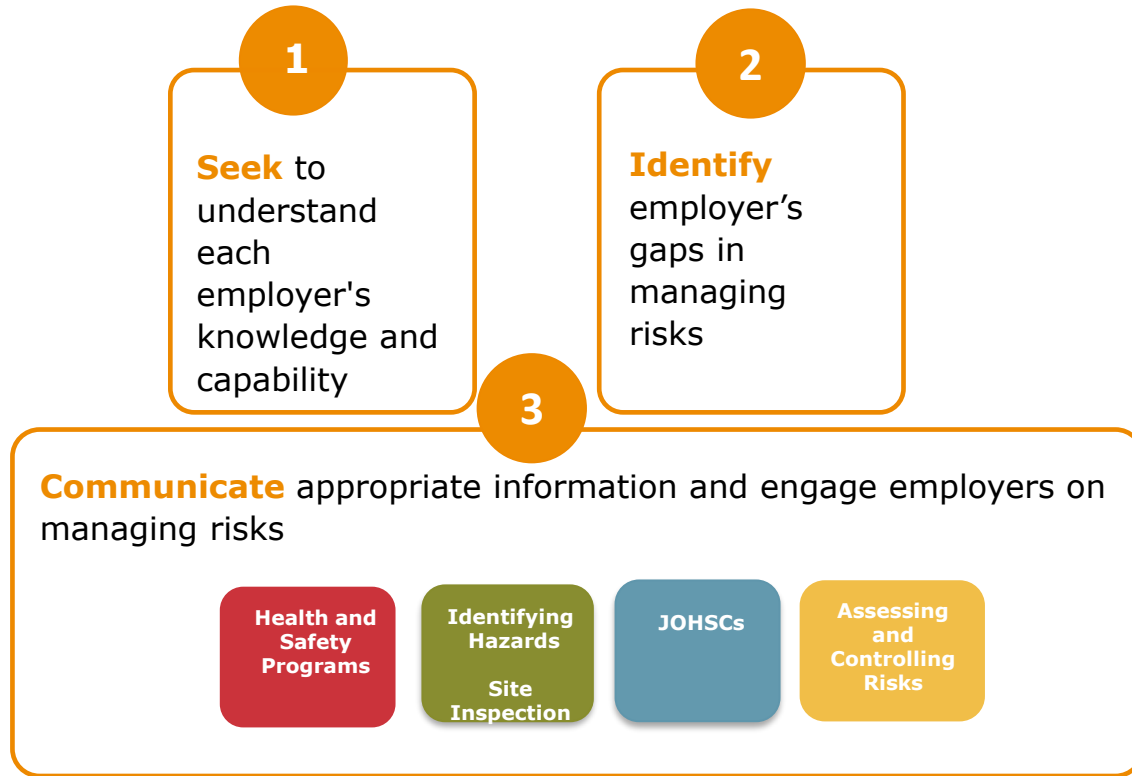
OHSR 26.2(2) Planning and conducting a forestry operation

Every person who has knowledge and control of any particular activity in a forestry operation must ensure that the activity is both planned and conducted in a manner consistent with this Regulation and with safe work practices acceptable to the Board.

- Prime contractor should conduct a risk assessment with subcontractors to identify hazards and assess risks on site, and implement control measures to effectively manage the risk
- Workers can then be oriented to the plan at the initial safety meeting
 - update plan as needed and communicate changes to all involved

Risk-Based Management Approach

Risk-Based Management Approach



Risk Management

Hazard

A thing or condition that may expose a person to a risk of injury or occupational disease

Risk

The chance of injury or disease resulting from contact with or exposure to a hazard

Risk Management

Risk assessment

An assessment of the probability (or likelihood) of contact with or exposure to a hazard, and the probable (or likely) consequences associated with that contact or exposure on a low to high severity scale of injury or illness, with death being the most severe

Probability

The likelihood that contact with or exposure to a hazard will occur with likelihood increasing as the frequency and/or duration of exposure to a hazard increases

Risk Management

Consequence/Severity

Measures the magnitude of harm, damage, or impact resulting from a hazard

This takes account of the acute risk (happens suddenly) and/or chronic risk (happens slowly) of a hazard

Coordinate Health & Safety Activities

Coordinate Health & Safety Activities

Where workers of two or more employers are working at the same time (a multiple-employer workplace), the prime contractor is responsible for:

- Coordinating the health and safety activities of employers (subcontractors), workers, and other people on the site
- Putting in place and maintaining a **system** to ensure site-wide compliance with health and safety requirements

Coordinate Health & Safety Activities

The **system** may include elements such as:

- Hazard identification and risk management
- First aid assessment and first aid services
- Emergency response plan: consider unique hazards & operations of the site, and ensure all necessary training, equipment, and supplies are available (tested)
- Site orientations
- Ensuring workers are adequately trained
- Inspections - regular according to the risk
- Safety meetings - minimum monthly
- Incident reporting and investigation

Regulatory References

Regulatory References

WCA 13 Definitions: prime contractor, owner, employer, & multiple-employer workplace

WCA 24 Coordination of multiple-employer workplaces

WCA 25 General duties of owners

OHS Policies, P2-24-1 What qualifies as a multiple-employer workplace)

OHSR 3.20 First aid responsibilities at multiple employer workplaces)

OHSR 26.1.1 Prime Contractor requirements for forestry operations

OHSR 26.1.2 Multiple-employer workplaces

OHSR 26.2 Planning and Conducting a forestry operation

OHS Guideline G26.1.2 Owners' Obligations

OHS Guideline G26.1.2-2 Prime Contractor Obligations

Prime contractor role and responsibilities

The prime contractor plays a key role in workplace health and safety. This role involves coordinating the health and safety activities of employers. It also involves putting in place and maintaining a system that ensures all employers comply with their health and safety responsibilities.

The prime contractor should know the work activities and hazards at the workplace, as well as how to ensure risks are controlled effectively.

This document outlines the role and responsibilities of the prime contractor.

Have a written agreement

At a multiple-employer workplace, it's essential to have a written, signed agreement in which the owner of the workplace designates a prime contractor. Without this written agreement, the owner is the prime contractor. (The owner can be the property owner, a tenant, a property manager, or an agent of the owner.)

Misunderstandings can occur when safety roles and responsibilities are unclear. Verbal agreements about who is the prime contractor are not valid. They can lead to confusion and compromise worker safety.

Coordinate health and safety activities and ensure compliance

Where workers of two or more employers are working at the same time (a multiple-employer workplace), the prime contractor is responsible for:

- Coordinating the health and safety activities of employers (subcontractors).
- Putting in place and maintaining a system to ensure site-wide compliance with health and safety requirements. The system may include elements such as:
 - Site orientations
 - Worker training
 - Hazard identification and risk management
 - Safety meetings
 - Inspections
 - First aid assessment and first aid services
 - An emergency response plan
 - Incident reporting and investigation

Communicate and coordinate with employers

The prime contractor communicates and coordinates with employers by:

- Conducting pre-planning meetings and attending site meetings with employers
- Having each employer provide the names of their designated supervisors

In some sectors (e.g., construction, oil and gas), the prime contractor must also:

- Have each employer provide the name of the qualified person who is responsible for the employer's site health and safety activities.
- Ensure employers notify the prime contractor before any work that is likely to create a hazard for workers of another employer.
- Let employers and workers know about workplace hazards that could affect them.
- Appoint a qualified coordinator to ensure coordination of health and safety activities for the worksite.

Maintain accurate records

Clear and accurate documentation helps prime contractors show they are fulfilling their responsibilities.

Examples of documentation include:

- Risk assessment and control measures documentation
- Safety meeting records
- Site and equipment inspection reports
- Incident investigation and corrective action reports
- First aid records
- Worker orientation and training records

Key regulatory references

- *Workers Compensation Act*, section 13 (definitions of "prime contractor," "owner," "employer," and "multiple-employer workplace")
- *Workers Compensation Act*, section 24 (prime contractor responsibilities at multiple-employer workplaces)
- Occupational Health and Safety Regulation, section 3.20 (first aid responsibilities at multiple-employer workplaces)
- Occupational Health and Safety Policies, item P2-24-1 (what qualifies as a multiple-employer workplace)