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Canada

The IRC Response to the COVID Crisis: Canada's case study on Personal Protective Equipment

Presentation to the OECD Public Governance Directorate:
Meeting of the National Focal Points for Policy Coherence

Thursday, November 26, 2020

Background on PPE in Canada



Canada has a strong history of IRC in standards and certification of personal protective equipment (PPE)

For years, Canada and its sub-national entities have been referencing the US standard for filtering facepiece respirators (respirators) in its Labour Codes and Occupational Health and Safety regimes



Since the start of the COVID pandemic, the demand for PPE, and specifically respirators, has increased dramatically

Canadian businesses have 'retooled' to start manufacturing respirators domestically

The US standards setting body, the US National Institute for Occupational Safety and Health (NIOSH), has deprioritized the certification of respirators manufactured outside the US, due to workload pressures for at least the next 12-18 months

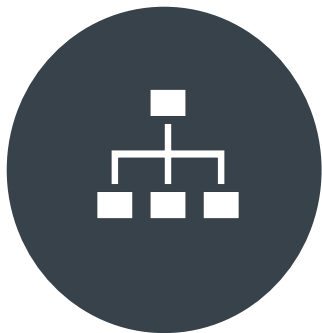
The issue with Respirators



Respirators not certified by NIOSH may not be considered in acquisition processes in most provinces and territories, for use in hospitals, for example

They may not be approved for use by organized labour groups and/or employers

This could prevent the trade of Canadian made PPE in Canada



The NIOSH standard and certification is trusted by employers and employees in Canada

There is a perception that other products that do not meet the standard are lesser quality

However, Canada needs to develop a Canadian standard to ensure there is an appropriate supply and demand of respirators

The Process for Cooperation



Canada is working to:

- Develop a domestic standard and certification process that meet the needs of employers and employees in Canada;
- Ensure that the Canadian standard will be accepted by employers and labour unions across Canada.



To avoid a domestic trade barrier, Canada must:

- Work with its sub-national counterparts to ensure that each jurisdiction (there are 14 in Canada) references the new Canadian standard in their Labour Code and Occupational Health and Safety regimes
- Promote Canadian certified respirators as adequately certified and safe PPE to be used by jurisdictions, employers, and unions.

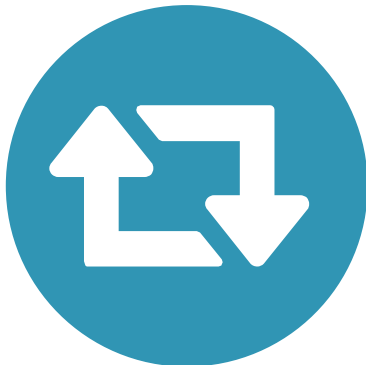
Current challenges



Domestic standard and certification in Canada could result in duplication of NIOSH processes for certifying respirators; processes which have been streamlined by IRC for years

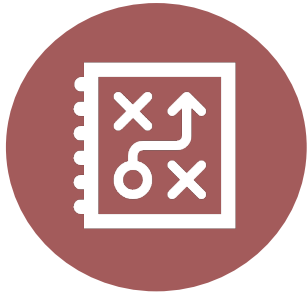
- Manufacturers will be frustrated if certification processes are not aligned or mutually recognized in other jurisdictions
- It could increase production costs which could be passed to sub-national jurisdictions or employers during an already difficult economic recovery

To ensure that Canadian products can support the global need:



- A domestic certification **CANNOT** fully replace the NIOSH standard; Canada will advocate for an either/or scenario
- The Canadian standard needs to closely align with NIOSH to ensure access to the global market for import AND export

Early Lessons Learned



This is the first time that Canada is navigating the intersection between IRC and domestic regulatory cooperation. This is only the first step:

- Once the Canadian standard and certification processes are complete, mutual recognition with trading partners will be key
- The domestic standard and certification, if not aligned with NIOSH, could create further IRC challenges in the future



Dialogue is key:

- Domestically, Employers and organized labour groups need to know that the domestic standard and certification is high quality
- Internationally, IRC partners need to understand the impact that unilateral decisions have on the global supply chain