

First Aid vs. Naloxone

Two rules. Two statutes. Two regulators.



	First Aid REGULATION 1101	Naloxone OHSA S. 25.2
STATUTE	Workplace Safety and Insurance Act	Occupational Health and Safety Act
ENFORCED BY	WSIB	Ministry of Labour inspectors
WHO IT APPLIES TO	Every business covered by the WSIA	Only workplaces meeting a three-part risk test
WHAT TRIGGERS IT	Headcount per shift	Employer awareness of worker overdose risk
DOES IT CHANGE?	Only if your headcount changes	Yes — you can move in or out of scope
WHERE IT IS STORED	The first aid kit No medications. No EpiPens.	Its own hard case Never inside the first aid kit.

Regulation 1101 compliance does not make you naloxone compliant — and it never did.
 Mapping your duties against Reg 1101 alone means you will keep missing things.

NALOXONE IS MANDATORY ONLY IF ALL THREE ARE TRUE

- 01 There is a risk of a worker opioid overdose** — from a prior overdose, a disclosure, observed use, discarded paraphernalia, or a concern raised by the JHSC, a health and safety rep, a union rep, or HR.
- 02 The risk exists at a workplace where that worker performs work** for the employer — not somewhere else, and not while the worker is on leave.
- 03 The risk is posed by a worker who performs work for that employer** — on a multi-employer site, only that worker's employer carries the duty. Risk from customers, clients, patients or the public does not trigger the requirement.

If any one of the three is absent, section 25.2 does not apply — though providing naloxone voluntarily remains a sound decision in many workplaces.

Documentation doesn't make workplaces safer. People do.