

COVID-19
DRAFT-SNOW RESORT BEST
PRACTICES
WINTER OPERATIONS

FOR INTERNAL INDUSTRY USE ONLY. NOT FOR DISTRIBUTION

ONTARIO
SNOW RESORTS ASSOCIATION

July 15, 2020

OSRA
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Dear OSRA Member,

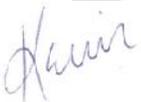
Attached to this letter is a Draft of the Ontario Snow Resorts Association, COVID-19 Winter Best Practices version as of July 15th, 2020. This document was developed nationally in collaboration with Canada West Ski Areas Association (CWSAA), Ontario Snow Resorts Association (OSRA), Association des Station de Ski du Québec (ASSQ), Atlantic Snow Resorts Association (ASRA), and with contributions from the National Ski Areas Association (NSAA) in the US. All readers of this document should note the following regarding the COVID-19 Winter Best Practices:

-) The document provides guidance only and does not supersede any official Authority. Snow Resorts must follow provincial health authorities and regulator guidance and regulations.
-) The document versions drafts are best envisioned as a living document. OSRA members and all parties receiving this document have not been asked to “sign on” to this document or guarantee its implementation.
-) This document is purposefully marked as draft. Given the current and rapidly changing environment associated with the COVID-19 global pandemic, it is expected that these best practices will evolve to meet updated provincial health authority advice and guidance.
-) **This document is not intended as a public-facing document or for open circulation.**
-) An additional template for COVID-19 Winter Best Practices is being drafted and will be circulated and will be made available to members upon request from OSRA later this summer.
-) Feedback on this version of the COVID-19 Winter Best Practices can be sent to kevin@skiontario.ca

OSRA would like to take the opportunity to thank OSRA Risk Committee, OSRA Board of Directors, CWSAA Risk Committee, CWSAA Board of Directors, ASSQ, ASRA, Ecosign Mountain Resort Planners, and Kate Collins-Cavers for their expertise and contribution to this document.

Please contact the OSRA office with any questions and further updates will be made as they become available.

Thank you,



Kevin Nichol

President

Ontario Snow Resorts Association

This report was prepared by: Ecosign Mountain Resort Planners, CWSAA, OSRA, ASSQ, with content and input from multiple industry-wide working groups of Snow Resort professionals and Kate Collins-Cavers.

Thank you to Inter-Mtn Enterprises for the sign images included in this document.

This document is intended as a resource for Snow Resort managers. It is a compilation of information for snow resort personnel and other industry professionals and associations.

This document is not intended to dictate requirement and should not be interpreted as a standard. It contains informational resources and examples that may be updated, revised or withdrawn at any time. It is provided without warranty of any kind.

Operations will vary from area to area. Deviation from the information presented may be dictated by the circumstances of each unique situation and by the policies, procedures and protocols of each individual Snow Resort. Laws, regulations and policies may also vary in different jurisdictions. The guidance contained within this document is not meant to exempt Snow Resorts from their existing occupational health and safety (OHS) or industry requirements.



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1. OVERVIEW

This document has been prepared on behalf of the four Canadian associations representing the alpine ski and snowboard industry in Canada. The four associations are:

- Atlantic Snow Resorts Association (ASRA)
- Association des Stations des Skis du Québec (ASSQ)
- Ontario Snow Resorts Association (OSRA)
- Canada West Snow Resorts Association (CWSAA)

A primary area of focus for each of these associations is safety and risk management. This guide is intended as a national and provincial set of best practices for the operation of snow resorts during the COVID-19 pandemic. A Steering Committee from the associations was established and Ecosign Mountain Resort Planners, an internationally renowned consulting firm specializing in ski resort planning was retained to assist with the work. Ecosign is widely regarded as one of the world's leading mountain resort planners, with projects on five continents. Their knowledge in assessing the capacity balance of the various components of Snow Resort operations has guided development of the best practices based on the directions of Public Health authorities, government, and Occupational Health & Safety regulators. The resulting guide has drawn input from a wide cross-section of the Snow Resort operators across Canada.

As the rate of transmission of the COVID-19 virus slows across Canada, the federal and provincial governments are working with industry sectors to safely resume operation and protect workers, the public, and communities. Protocols must address how the current series of Public Health Office (PHO) orders and recommendations will be followed, including:

- Emergency Orders
- Prohibition of large gatherings
- Physical distancing of 2 meters
- Frequent hand hygiene
- Cleaning and disinfection
- Self-isolation policy for employees who have symptoms of or have tested positive for COVID-19
- 14-day self-quarantine for people who have traveled outside of Canada
- Phased Approach to re-opening the economy

1.1 Purpose

This document provides practical advice and guidelines to ensure safe operations of snow resorts as we all learn about the phased approach to reopening during the COVID-19 pandemic.

The purpose of this document is to assist each snow resort in adapting their business to safely operate within the emergency restrictions imposed by the Federal Government, Provincial Government, and Health Organizations to limit the transmission of the virus that causes the COVID-19 illness.

The preparation of these guidelines is based on the following assumptions:

- Federal, Provincial and Municipal government restrictions allow for attendance by the public at snow resorts for outdoor recreation.
- Requirements to avoid person to person transmission of the COVID-19 virus by physical distancing of 2 metres between non-household members, remains in effect.
- Providing a physical barrier and/or personal protective equipment (PPE) used in situations where physical distancing cannot be achieved.
- Cleaning and disinfection measures to reduce or eliminate the potential of surface to hand and/or airborne transmission(s).
- Visitors to a Snow Resort consist of many separate household groups and individuals, and do not constitute a large gathering. Snow Resort Operators will implement measures to encourage these groups to remain physically distanced from one another and from the employees while they are visiting.

1.2 Public Health Directives

Currently all tiers of government have declared a “State of Emergency” regarding the potential danger to public health caused by the COVID-19 novel coronavirus. The various levels of governments have continued to issue Public Health Orders and Directives as well as guidance for the general public, businesses and employees over the last several months, and it is expected that they will continue to provide similar guidance for the foreseeable future. Businesses who are able and wishing to operate during the pandemic must ensure they are compliant with the requirements of their provincial and municipal public health agencies.

The operational best practices put forth in this document, fall underneath the guidance provided by official authorities and regulators. Please see appendix 1 for individual links to provincial jurisdictions.

Many snow resort operators also provide other tourism related businesses/amenities, such as food and beverage, events, and public accommodation. Given these sectors have developed their own guidelines for operations during COVID-19, where applicable, the snow resorts may defer to the best practices of that specific sector to foster consistency, including:

Restaurants Canada: [ctrl click for information & resources](#)

Hotel Association of Canada: [ctrl click for information & resources](#)

Ontario Restaurant, Hotel & Motel Association [ctrl click for information & resources](#)

1.3 Phased Approach to Opening

At the beginning of the COVID-19 pandemic the federal and provincial government announced emergency orders to shut-down non-essential businesses. Once the provincial governments regained suitable level of control over the spread of COVID-19, they introduced a regional phased approach to reopening business based on risk level. The province has indicated that they will reserve the right to process ahead or retract any of the phases if there are community outbreaks, second or third waves or a vaccine is available.

All three phases may have some level of impact on a Snow Resort’s ability to return to pre-pandemic full operations, it is therefore important to consider developing a business plan and strategy to operate within the restrictions of emergency orders and phased approach for reopening.

See below for an abbreviated table of the phased approach to reopening. See link for full [ctrl click for information & resources](#) phased approach resource.

| Phase 1 | Phase 2 | Phase 3 |
|---|---|--|
| Re-opening industry services & retail with restrictions. | Re-opening more workplaces. | Opening all workplaces responsibly. |
| Re-opening outdoors, recreational & seasonal activities with restrictions. | Opening more community and outdoor spaces and allowing some larger public gatherings. | Further relaxing the restrictions on recreational spaces and public gatherings. Allowing 50 people indoor gatherings and 100 people outdoor gatherings. Large public gatherings such as concerts, night clubs, and sporting events will continue to be restricted. |
| Re-opening of health care facilities if they are able to meet COVID-19 related requirements to operate. | Continuing to reopen full services with some restrictions. Maintaining protections for vulnerable populations and the continued practice of physical distancing, hand washing, respiratory hygiene, and significant mitigation plans to limit health risks. | Allowing full services to resume. Maintaining protections for vulnerable populations and continued practices of physical distancing, hand washing, and respiratory hygiene, and significant mitigation plans to limit health risks. |

1.4 Workplace Safety Directives

Each Province has a provincial agency, or agencies, dedicated to promoting safe and healthy workplaces. The provincial regulators set their own regulations and **employers must follow those regulations**. The regulator partners with employees and employers to prevent work-related injury, disease, and disability. These agencies help businesses meet their obligations to provide a safe workplace for all their employees.

The Snow Resort Sector Best Practices incorporates and follows these regulations. See Appendix 1 for links to provincial work safety agencies to get the most up to date information.

Employers in Canada have obligations to ensure the health, safety and welfare of workers and other persons in the vicinity of a workplace. With respect to COVID-19, that responsibility includes protecting workers by

following the orders issued by the office of the provincial health officer, guidance provided by the Public Health Agency of Canada and the latest news released from the government. In addition to provincial authorities, national guidelines may be found:

Canada: [ctrl click for information & resources](#)

Ontario: [ctrl click for information & resources](#)

2. WORKPLACE PREVENTION PROTOCOLS

During the COVID-19 outbreak, snow resort operators will follow all mandates/orders from Health Canada, their respective Provincial Health Offices (PHO), as well as regional, municipal and health/workplace safety authorities.

As more is learned about COVID-19, it is understood that best practices will evolve to ensure worker safety. The **Occupational Joint Health & Safety** (JHSC) committees and/or Safety Representatives as well as key team leaders within your organization will be an invaluable source of input directly from workers that will assist in developing a safety plan aimed to amend and advance implemented protocols.

To comply with current federal, provincial and regional recommendations, and existing protocols related to influenza/respiratory hygiene and pandemic planning, each organization will implement protocols while remaining adaptable as the situation continues to evolve.

(The reference to the term “Team Members” refers to the employees and volunteer workers of the Snow Resort operator and to contractors/subcontractors working within the Snow Resort operator’s property or Controlled Recreational Area.)

2.1 Workplace Safety Directives

As previously mentioned, each Province has a provincial agency, or agencies, dedicated to promoting safe and healthy workplaces. The provincial regulators set their own regulations and **employers must follow those regulations**. The snow resort sector best practices incorporate and follow these regulations. See Appendix 1 for links to provincial work safety agencies to get the most up to date information.

2.2 Employer Responsibilities

During the COVID-19 pandemic employers are to lead their teams through various phases of the “State of Emergency”. It is important to continually develop your emergency safety plans to ensure business continuity during the pandemic. Employers, along with their teams, should develop a safety plan to demonstrate how the business can safely operate for guests, employees, contractors, suppliers, and other visitors that may enter the business property. An employer may develop emergency safety plans that may include, but are not limited to the following:

1. How will employers ensure all workers know how to keep themselves safe from exposure?
2. How will employers screen for COVID-19?
3. How will employers control the risk of transmission in the workplace?

4. What will employers do if there is a potential case of, or suspected exposure to COVID-19 at the workplace?
5. How will employers manage any new risks caused by changes to the way they operate their business?
6. How will employers make sure the plan is still working?

The Government of Ontario has provided resources to assist with developing a COVID-19 safety plan for your business. [ctrl click for information & resources](#)

Businesses must regularly assess and/or inspect for hazards within their operations while taking appropriate steps to eliminate or control the associated risk. Businesses must also ensure they are taking all the appropriate actions to protect themselves and others against the risk of exposure to COVID-19.

Such controls will include adhering to current public health orders, if applicable, and public health advice, as well as implementing best practices to keep their employees and guests safe.

Refer also to section 3.2 related to Snow Resorts Operational Audits.

2.3 Exposure Control

Employers are to implement a plan that reduces the risk of exposure to COVID-19. This includes a provision for written policies and procedures, communicating precautions to workers, and training supervisors and workers to follow the precautions.

Employers are to undertake regular inspections of the workplace, document and remedy unsafe or harmful conditions without delay, and update the workplace COVID safety plans as needed. With respect to potential COVID-19 exposures, employers should:

- Ensure that physical distancing is maintained wherever possible;
- Review work procedures to ensure appropriate distancing;
- Identify potential means of transmission on surfaces and minimize worker contact with those surfaces and regularly sanitize such surfaces;
- Assess and address new risks from resuming or making changes to operations.
- Stay informed of all public health orders, directions, and requirements, and take appropriate action in their workplace to prevent transmission of the virus.

2.4 Workplace Health Guidelines

The organization's updated team illness policy will be communicated to all Team Members before returning to work.

Workplace illness policies should address the following:

- Not to come to work if sick or feeling ill
- Expectations from Team Members when they report to work (e.g. washing hands, wearing PPE, undergoing wellness assessment)
- What Team Members should do if they feel sick (e.g. reporting procedures)
- Sick leave entitlement (or Family Employee Assistance Program) related to COVID-19.
- Reporting requirements to the Ministry of Labour, local Health Unit, and Workplace Safety and Insurance Board.
- Early and Safe Return to Work Program, to manage or re-integrate workers demonstrating or actually presenting COVID-19 symptoms.

Employers should ensure that Team Members do not come to work if they are displaying symptoms of COVID-19. This includes workers who fall into the below categories:

- Anyone with COVID-19-like symptoms should use the government self-assessment tool to determine next steps: [ctrl click for information & resources](#)
- Team Members who have travelled internationally.
- Team Members who live in the same household as a confirmed or clinical COVID-19 case who are self-isolating.

If Team Members report having COVID-19-like symptoms while at work:

- Remove them from the worksite immediately and send them home.
- Instruct Team Members to consult Public Health for direction and duration regarding self-isolation and/or local testing centre.
- Clean and disinfect their work station and any areas or tools that they were using as part of their job.
- Follow any directions from public health with regard to detailed cleaning and disinfecting, temporary closure and contact tracing.
- Follow-up with team member and participate in any reporting requirements.

Employers should ensure that these policies are communicated to their managers, supervisors, and workers.

2.5 Mental health, violence, bullying and harassment

A public health emergency, like the COVID-19 pandemic, can cause heightened stress, anxiety, fear and a lack of control. It can challenge individuals in different ways, impacting the workplace and home life, as they try to cope. People may not cope or behave as they typically would and this could lead to the manifestation of mental health concerns, escalating violence, bullying and harassment.

Mental health and wellbeing should be openly discussed in the workplace and information on potential resources that may be of help to workers should be made available. Some measures that employers can implement include the following:

1. Have a plan. Let employees know that you are thinking and looking ahead, that you will stay well-informed and that you can answer the questions they already have.
2. Communicate, share and be open. Worry and fear grow in the absence of up-to-date information. Let your employees know that they can expect regular updates from you. Communicate even if the situation remains unchanged.
3. Empathize. Share that you know it's stressful. Recognize that it's okay to be anxious. Remind your employees of any resources (e.g. Employee Assistance Programs, Government and community resources) that are available for those who are experiencing stress.
4. Reassure—as best you can. You can refer to reports indicating that most people who become infected with the virus will recover.
5. Understand. Recognize when stress has become unmanageable for individual employees. Stress can lead to anxiety and even panic. Encourage employees to practice self-care activities on-the-job and reassure them that it's ok to take steps to manage stress, such as relaxation exercises, listening to relaxing music or taking regular breaks.
6. Recognize this is not quite business as usual. Know that work will likely be impacted, work will slow down, and necessary travel may be cancelled. Reassure staff that expectations will shift accordingly, and that's ok. We will get through this!

Taking Care of Your Mental Health (COVID-19) (Public Health Agency of Canada) – Tips and resources for taking care of your mental health during the COVID-19 outbreak: [ctrl click for information & resources](#)

2.6 Team Member Responsibilities

Team Members **without** symptoms of COVID-19 are to adhere to the following protocols:

1. Stay home if you are ill or feeling ill.
2. Wash your hands with soap and water (for at least 20 seconds) before and frequently during your shift, and after your shift has ended.
3. Avoid being in an enclosed space with others, wherever possible.
4. Practice physical distancing.
5. Inform your manager immediately if you feel any symptoms of COVID-19.
6. Avoid touching your eyes, nose, or mouth with your hands or when wearing gloves.
7. Cover your mouth and nose with a tissue when you cough or sneeze, then throw the tissue in the trash and wash your hands, or sneeze/cough into your elbow.
8. If soap and water are not readily available, use an alcohol-based hand sanitizer.
9. Clean and disinfect frequently touched objects and workstation surfaces.
10. If it is unsafe or you feel unsafe performing your duties, talk to a supervisor, joint health and safety committee or worker representative.
11. Stay informed. Information is changing frequently.

2.7 Workplace Rights

It is important that all workers understand their workplace rights in Ontario. These include the following:

-) To be treated fairly at work.
-) To work in a safe and healthy workplace.
-) To be trained to deal with workplace hazards.

Team Members should know and understand their workplace health and safety responsibilities and those of others. Team Members have three key rights:

-) **Right to know** - for example, workers have the right to know about hazards in the workplace.
-) **Right to refuse** - for example, workers have the right to refuse unsafe work.
-) **Right to participate** - for example, workers have the right to identify and resolve workplace health and safety concerns.

For more information on workplace rights, please see the following link: [ctrl click for information & resources](#)

Your Right to Refuse Work - COVID-19

The OHSa provides the worker with the right to refuse work where a worker believes they will be endangered or there are risks to their health and safety.

Certain occupations that have a responsibility to protect the public safety have limited rights to refuse work if the danger in question is a normal part of the job or if the refusal would endanger the life, health or safety of another person. For example, positions including ski patrol, security, emergency response team, and persons required to provide first aid as part of their job.

These workers cannot refuse to work when either:

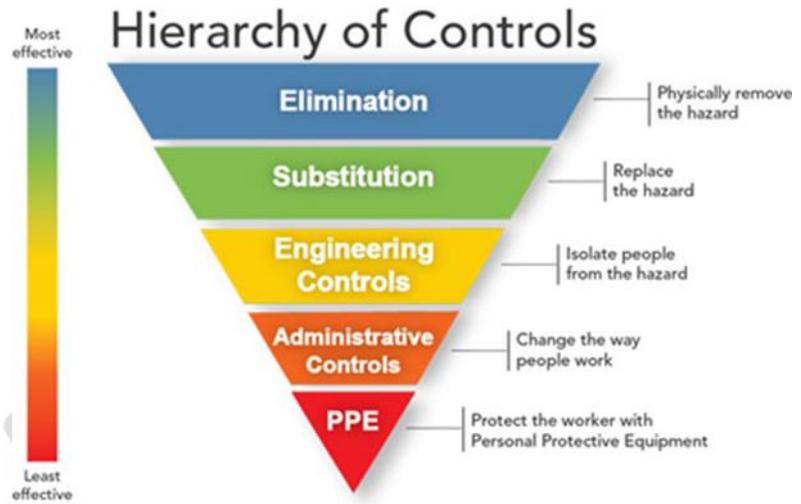
1. The dangerous circumstance is inherent in the work or is a normal condition of their employment.
2. Their refusal to work directly endanger the life, health, or safety of another person.

For more information on the work refusal process, please see the following link: [ctrl click for information & resources](#)

2.8 Hierarchy of Controls

When hazards related to COVID-19 cannot be completely eliminated, the following hierarchy of controls should be followed:

- **First Choice: Elimination or Substitution:** Consider eliminating, modifying, or postponing work tasks that may create a risk of exposure to COVID-19.
- **Second Choice: Engineering Controls:** Control of a hazard at the source. Examples include placing barriers or partitions between staff, removing seats from lunch rooms and dining areas, rearranging lockers, restricting general access to the business and increasing ventilation and air quality.
- **Third choice: Administrative Controls:** These controls change the way workers, volunteers and patrons interact. Examples include policies and signage for physical distancing, limiting hours of operations, working from home, respiratory etiquette, and providing adequate facilities, supplies and reminders for hand hygiene.
- **Fourth choice: Personal Protective Equipment:** PPE is used when physical distancing or physical barriers cannot be maintained by administrative and engineering controls. PPE controls the hazard at the worker, volunteer and client level. Examples of PPE include gloves, eye protection, gown, face protections, masks.

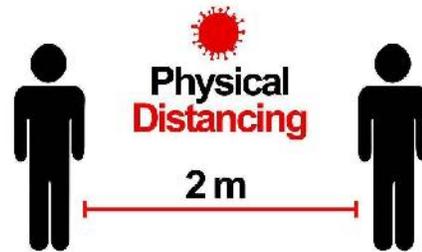


When a hazard cannot be eliminated or controlled by a single control method, the business owner may utilize a combination of controls to provide an acceptable level of safety. To reduce the risk and prevent the spread of COVID-19 the federal, provincial, and municipal governments have made the following recommendations:

2.8.1 Physical Distancing

Described by the Public Health Agency of Canada, physical distancing means limiting close contact with others and taking steps to limit the number of people you come in close contact with. When not possible, other controls need to be implemented (see *Hierarchy of Controls*).

When outside of the home, practicing physical distancing by keeping two metres (six feet) away from one another is something we can all do to help stop the spread of COVID-19.



Practice physical distancing, wherever possible, as follows:

1. Keep at least two metres (six feet) distance between yourself and others.
2. Do not shake hands with customers or team members, nod or wave instead.
3. Follow protocols for shifts, breaks and staff meetings.
4. Minimize physical interaction with customers and fellow team members, whenever possible.

Physical Distancing is important to prevent the spread of COVID-19. There are a number of risk control actions that employers can consider applying to their business operations for Physical Distancing, which may include but are not limited to the following:

-) Where/when possible provide indicators, create barriers, or where possible change people capacity to Square Footage.
-) Develop procedures and training for staff on physical distancing.
-) Post signage for physical distancing rules.
-) Educate and inform people about physical distancing on your property.

2.8.2 Personal Hygiene & Sanitation

Personal Hygiene and Sanitation are critical for staff and guests to reduce the transmission of COVID-19. Consider some of the following recommendations regarding personal hygiene and sanitation:

-) Frequent and proper handwashing is encouraged as the best way of preventing all viral respiratory infections and other illnesses.
-) Use hand sanitizer, ideally alcohol-based hand rubs (ABHR) should be readily available and recommended to be placed in a variety of locations such as entrances to facilities, payment areas, line ups, washrooms, and garbage disposal etc.
-) Sneezing and coughing into your sleeves.
-) Avoid touching your face, eyes, nose, and mouth.
-) Avoid contact with people that are sick.
-) Stay at home and self isolate if you are sick.
-) Wash clothes and uniforms frequently.
-) Prepare staff to participate in COVID-19 testing and contact tracing in line with local health care protocols to protect themselves, co-workers and guests.

-) Personal responsibility for cleaning surfaces and items that are touched.
-) Provide, wear, and maintain PPE when asked to do so.

Personal Hygiene & Sanitation is important to prevent the spread of COVID-19. There are a number of risk control actions that employers can consider applying to their business operations for personal hygiene and sanitation, which may include but are not limited to the following:

-) Install, provide, or add more areas on the property that allow personal hygiene and sanitation to take place. For example, add hand washing or sanitizing stations, consider making changes to restroom configurations, and to garbage/waste collection and disposal. Consider adding hand washing or sanitizing stations when entering or leaving a public building, food and beverage, maintenance facility, and any other structure at the Snow Resort.
-) Provide or change cleaning and sanitation chemicals that, when used or applied, assists in the reduction of COVID-19.
-) Create or change policies, procedures, and training on personal hygiene and sanitation to include public guidelines on COVID-19.
-) Review and prepare policies and procedures related to staff absences or guest cancellations if they become ill or contract COVID-19, as this will have impact on scheduling and poses risk to business.
-) Post information, signage, and/or pictograms on personal hygiene e.g. hand washing, indicators to identify personal hygiene/sanitations stations on the property.

Follow hand washing as set out by Health Canada: [ctrl click for information & resources](#)

2.8.3 Personal Protective Equipment

PPE is important to prevent the spread of COVID-19. There are number of risk control actions that employers can consider applying to their business operations for PPE, which may include but are not limited to the following:

-) Establish and determine where, when, and what PPE will be required to be used by guests, workers, suppliers, or contractors when on the Snow Resort property.
-) Identify in job posting or job descriptions where workers are required to provide their own PPE, as part of the job.
-) Determine what PPE will be supplied to guests, workers, and other property, and find adequate supply.
-) Develop or review PPE use policies and training for workers.
-) Post information, signage, and/or pictograms on use of PPE.

In Ontario, as of July 5th, 2020 many counties and municipality health care authorities are recommending or requiring that masks be worn in indoor spaces to reduce the spread of the COVID-19 virus. For further instructions and requirements on face masks, please gather regionally specific information for your snow resort or visit this provincial link: [ctrl click for information & resources](#)

More information on PPE can be found at: [ctrl click for information & resources](#)

2.8.4 Cleaning and Disinfecting

Cleaning and disinfecting buildings, vehicles, equipment, machines, tools, and PPE will aid in reducing or eliminating the spread of COVID-19 within Snow Resort environments. Employers should work with local health departments to ensure appropriate protocols and guidelines for cleaning, disinfection, and decontamination of pathogens, more specifically COVID-19.

Employers should work with their local health department to ensure appropriate local protocols and guidelines, such as updated/additional guidance for cleaning, disinfection and decontamination, are followed, such as:

Cleaning

-) Clean surfaces using soap and water, then use disinfectant.
-) Practice routine cleaning, based on level of use, surfaces, and more frequent cleaning of high touch surfaces.
-) Review cleaning schedules, surfaces/materials related to buildings, vehicles, equipment, machines, tools, and devices and identify where cleaning schedules require change to reduce or eliminate the spread of COVID-19.

Disinfecting

-) Consider purchasing disinfecting chemicals that are recommended for COVID-19 and review manufacturers' recommendations for use.
-) Review use and mixing recommendations for COVID-19 for bleach solutions.
-) Review use and recommendations for alcohol solutions, especially alcohol solutions +70% .

Decontamination

-) Use and determine what cleaning chemicals will kill COVID-19 virus.
-) Consider use of vacuum equipment with High Efficiency Particulate Air (HEPA) filters.
-) Consider omitting any dry sweeping/mopping/wiping methods to reduce the release of particles in the air.
-) Consider your procedures for managing contaminated waste, waste bags, and bins.
-) Isolate contaminated areas from the rest of staff and guests.
-) Allow for increased outdoor air circulation to contaminated areas.
-) Use appropriate PPE to reduce the risk of spread of COVID-19.
-) Consider retaining the services of an abatement contractor that has the appropriate personnel and equipment to decontaminate the area.

Find more information from your provincial health authority or Government of Canada on cleaning and disinfecting: [ctrl click for information & resources](#) Ontario, [ctrl click for information & resources](#)

3. SNOW RESORT WINTER OPERATIONS UNDER COVID-19 RESTRICTIONS

3.1 Introduction

Snow Resorts and mountain resorts (Snow Resort operators) provide the opportunity for safe outdoor recreation and exercise for the public. The nature of the sport of skiing is a physically distanced outdoor activity. Open outdoor spaces and physical distancing is the nature of the activities of snow sports. This section focuses on areas where physical distance between people may be reduced.

3.2 Operational Audit

Each Snow Resort will prepare an audit of the facilities/activities to determine adaptations to operate under the COVID-19 restrictions.

The necessary physical distancing and sanitation measures will likely reduce the “carrying capacity” of many operations/activities. Each Snow Resort will assess their operations to determine how many people they can safely accommodate at one time.

An audit may consider the following:

- Departmental review of business operation to understand where and how COVID-19 will impact business, service delivery, guests, employees, and process changes.

- Visualize the process of a guest entering the Snow Resort and proceeding to the various activity areas. Assess the existing bottleneck areas. Determine if the bottleneck can be eliminated or reduced by changing the way the operation is delivered.

- Consider the implementation of some means of Contact Tracing. i.e. Gathering guest contact info such as names and phone numbers at venues.

- Evaluate areas where limited capacity caused by implementing the COVID-19 reduction strategies may impact the capacity of the overall site.

- Determine which commonly touched objects that are not absolutely necessary can be removed. For those surfaces that cannot be removed and must be touched, develop a cleaning protocol to reduce the potential of surface to hand transmission. Consider making hand sanitizing available and disinfect surfaces frequently for those areas where touch cannot be avoided.

- Consider if COVID-related protocols create new or unanticipated hazards.

- Consider a signage audit to review where to place COVID-19 related signs in relation to other risk and operational signage.

- Snow resorts considering hosting sanctioned sport programs and events during the pandemic may require a Risk Management Assessment to be completed. Please contact your affiliated partners, i.e. Alpine Ontario, Snowboard Ontario, XC Ski Ontario for more information. (see program section 3.10 for resources and links)

Snow Resort Operators can apply to the [Ontario Government Re-opening Plan](#) when they feel that they are ready to re-open in a Phase 3 environment.

3.3 Financial Resources & Funding

Most businesses during COVID-19 will experience the ability to return to regular operations during the phased approach to re-opening. Unfortunately, Snow Resorts may experience challenges as they contend with restrictions during emergency orders and phased approach to re-opening. Snow Resorts might contend with challenges to operate or achieve financial goals and there may be a financial risk to the Snow Resort that will arise when developing your COVID-19 safety plan and 2020/2021 budgets/financial plans. Snow Resort managers may find financial challenges in the following list of examples:

-) Increasing or decreasing indoor building per person capacity, including amenities
-) Reduction or changes to ticketing sales & reservations
-) Reduction or changes to lesson programs, (providing services to children under certain age or maximum numbers of groups)
-) Increasing or reducing staff requirements based on what services a venue can provide
-) Food & Beverage, Retail, Repairs/Tuning curbside pick-up or delivery options
-) Transportation, capacity reduction within enclosed vehicles.
-) Changes to lift, terrain, and snowmaking capacity or operations based on demands.
-) Increase to methods and use of platforms to communicate COVID-19 safety plans to guests, employees, and users of Snow Resort and its' various amenities
-) Increase purchasing of cleaning chemicals, equipment, devices, and staff
-) Increased purchase of PPE

When developing and reviewing financial plans for COVID-19, it is important to understand the level of financial risk your business can assume and when you will require financial support. It is important to become aware of new financial support mechanisms through government programs and financial institutions. Here are some examples of financial support through government programs available to businesses in Ontario,

-) Interest and penalty relief for five months on provincially administered taxes
-) (Federal), similar relief as above on Corporate Income Taxes Owing
-) (Federal) Canada Emergency Wage Subsidy
-) Up to six-month deferral on Workplace Safety and Insurance Board payments and claims cost reporting will be deferred for August 31, 2020
-) Employers Health Tax Relief
-) Regional Opportunities Investment Tax Credit (for plan construction)

In addition, to government relief programs, speak to your financial institution to review items such as, payment deferrals, interest rate, and ask how they can assist. Depending on your Snow Resort's financial situation there are opportunities to save money, save on interest, and/or investment options for your business. Snow resort managers should consider seeking advice from their finance team, external financial advisors, and/or chartered accountants. More info available at, [ctrl click for more information & resources](#)

3.4 Guest Communications

During any emergency or crisis event, it is important to develop a comprehensive communication strategy or plan for the Snow Resort. Develop controls within your communication plan to prevent or reduce risk and create consistent messaging throughout the Snow Resort and set expectations for any user.

Messages need to be consistent across all platforms to explain the following:

-) Measures the Snow Resort and its employees are taking to ensure safety during COVID-19
-) Indicate where and when services are changing or altered due to COVID-19

Welcoming visitors and guests and outlining the expectation of personal/shared responsibility while at Snow Resort is important. This may include, but is not limited to the following:

Personal Responsibility Code (*proposed signage currently in discussion*)

-) Please stay at home if feeling sick/unwell or asked to quarantine by health care or government officials.
-) Wash hands thoroughly and often.
-) Use hand washing stations and hand sanitizing stations provided at the Snow Resort.
-) Practice safe physical distancing.
-) Mask wearing is recommended and will be required at times.
-) Pre-payment, credit card, and debit cards are preferred methods of payment.
-) Customer service delivery and capacity at the snow resort has been reduced.
-) Follow instructions or directional signs at the snow resort for yours and others wellbeing, health, and safety.
-) Clean and wash PPE and personal sports equipment/clothing frequently.

Snow Resort Commitment to guests during COVID-19

-) Allowing for space to practice physical distancing.
-) Increasing cleaning and sanitization.
-) Ensuring employee health.
-) Training employees on enhanced cleaning, health, and safety procedures.

(please see signage samples provided by Inter-Mtn below as examples)

****Additional feedback is required on Personal Responsibility Code and Snow Resort Commitments to guests****

In addition to signage, create opportunities where the resort can provide additional information, education, and training on how services delivery or operations will change due to COVID-19. Here are some examples:

-) Guest responsibilities: they cannot visit if they are experiencing symptoms that are not related to a pre-existing illness or health condition or are otherwise required to isolate or quarantine.
-) Guest and employee signature required on “personal responsibility code” or “wellness check-in” (potential future suggestion depended on state of phased re-opening).
-) Post and revise current list of symptoms see: [ctrl click for information & resources](#)
-) Post, where applicable, provincial signage [ctrl click for information & resources](#) and partner/liaise with your municipality and/or county offices to obtain additional support and/or materials.

- J Provide guests and employees with examples of when/why the Snow Resort may ask them to leave if they are demonstrating signs of being unwell or if the personal or shared responsibility code is contravened.
- J Provide additional information on inclusion, workplace/domestic violence & harassment, wellness, mental health, and environment awareness (where applicable). Some examples may include making changes to policies, procedures, programming, and training available to staff and or guests.
- J Signage, maps or indicators on where hand cleaning / sanitization stations are located at the Resort. Additionally, considerations for placement of providing COVID-19 information at first points of contact upon arrival (parking lot, hotel, village) to remind guests of physical distancing protocols.

Signage examples:



Potential signage language may include: **“The operator reserves the right to deny access to any guest they believe is not complying with the conditions listed above, or who exhibits any visible COVID-19 symptoms.”**

3.4 Partner Communication

Most Snow Resorts work with partner organizations such as sport organizations (e.g. clubs), event organizers, suppliers, and contractors. Communication with partners is important to ensure consistent messaging. It is important to determine how your partners are communicating as it may have an impact on access to your sales pipeline and supply chain.

Hosting of events may be different than past seasons and special consideration needs to be given to travel, group size and whether there are spectators: See section 3.10 for additional links. Much of this will be guided by public health policy regarding events and gatherings.

3.5 Payments

3.5.1 Payment Methods

(relates to all departments including tickets, food/beverage, retail, and rental)

-)] Promote the use of pre-purchases, cashless and touchless payment methods. Customers may be asked to pay with debit or credit cards only. Staff will be encouraged to ask customers to handle their payment card to reduce touchpoints.
-)] Consider reprogramming point of sale machines to allow for larger 'tap' purchase amounts.
-)] Enhance reservations or pre-ordering systems to limit and control number of ticket and season pass holders on hill. This may include introducing or enhancing RFID system
-)] Debit/Credit card terminals should be sanitized after each use.



3.5.2 Tickets & Pass Sales

-)] Snow Resort Operators with on-line ticketing or reservations can encourage guests to pre-purchase tickets on-line to reduce on-site activity at ticket windows.
-)] Considerations for reservations for season pass holders may be considered to control number of season pass holders at the Snow Resort. This may include introducing some new controls or making changes to existing RFID systems.
-)] A Snow Resort Operator offering on-site ticket sales may provide physical separation between staff and guests, as well as between guests. The typical exterior ticket window found at many Snow Resorts provides this. See Retail (section 3.10) and Line-ups (section 3.6) for further information.

3.6 Line-ups

-)] Evaluate how the operation can be modified to reduce the requirement for line-ups.
-)] Line ups should be set up to provide physical distancing (2 metre spacing in all directions) between individuals or between individual households and cohorts. In cases where minimum spacing is not possible, alternatives such as face coverings may be necessary for all users.
-)] Provide communication related to line-up timing expectations allowing guests to prepare.
-)] Consider adding additional personnel to manage line-ups, communications, and/or security if required.
-)] Plans and designs may require considerations for inclement weather.

(See example line up signage below)



3.7 Winter Lift Operations

-) Lift line-ups for upload and download will be structured safely as described above in 3.6.
-) Snow Resorts should outline protocols for physical distancing or alternate means for their lift infrastructure in their operating plan. Where physical distancing cannot be met, other controls such as face coverings may be used as an alternative.
-) Snow Resort signage, schedules, and plans should identify disinfecting measures for lift carriers and stations. This may vary based on jurisdiction, practicality, and weather conditions.
-) Within the lift terminals, Snow Resorts should develop cleaning and PPE procedures for lift staff to protect themselves and the guests.
-) Lift Evacuations and first responders may require additional PPE if there is close contact with a guest during rope evacuation. This would be dependent on how the Snow Resort performs emergency lift evacuations to rescue/extract guests from lift carriers.

3.8 Operations Departments

Operations departments referring to lift operations, snowmaking, patrol, maintenance, snow school, competitive programs, and events that use vehicles, equipment, machine, tools, and/or devices may require enhancement of procedures for cleaning and disinfecting for high touch surfaces or high use items. Additional consideration and precautions may need to be taken for potentially flammable or combustible cleaning chemicals or detergents used for COVID-19. Please review the following within your operations departments:

-) Substitution for cleaning chemicals or detergents that are non-flammable. Identify chemicals that may be a potential ignition sources or become unstable when using other chemicals.
-) When transferring chemicals (flammable or combustible chemicals) refer to grounding procedures.
-) When cleaning some vehicles, equipment, or machines refer to lock-out/tag-out procedures if/when required.

3.9 Buildings (Indoor spaces)

-) Occupancy capacities under physical distancing and phased re-opening should be posted at the entrances.
-) Identify when, where, and what PPE should be worn in indoor spaces, e.g. face masks.
-) Wait times, reservations, curbside pick-up, and delivery may need to be considered to offset the use of indoor spaces to manage occupancy capacities.
-) Hand sanitizing stations may be provided at the entrance to buildings along with appropriate signage.
-) Indoor touch surfaces (doors, knobs, faucets, payment card touch pads, tables, ATMs) shall be cleaned with a sanitizing solution frequently.

-)] Heating, Ventilation, and Air Conditioning (HVAC) systems or units may need to be cleaned and/or more frequent scheduled maintenance may need to be performed to improve indoor air quality and reduce levels of unwanted airborne particulates.
-)] Contact your HVAC service provider for recommendations to improve indoor air quality specific to COVID-19. This may include maintaining/cleaning ducts, adding filtration or filters, changing percentage of outdoor air to recycled air, or adding air cleaners.

Follow Public Health Canada or Provincial Health recommendations for cleaning and disinfecting public spaces during COVID-19.

Canada [ctrl click information & resources](#)

Province [ctrl click for more information & resources](#)

Other resources and information on HVAC for your consideration:

Article on HVAC and COVID-19 McKinsey [ctrl click for information & resources](#)

American Society of Heating, Refrigeration & Air Conditioning Engineers (ASHRAE) [ctrl click for information & resources](#)

3.9.1 Washrooms

-)] Signage may be placed in washrooms to advise guests of appropriate physical distancing, proper hand washing and waste disposal techniques.
-)] Determine the occupancy load of each washroom based on maintaining the required physical distancing and post this on a sign outside the entrance.
-)] Frequent cleaning and disinfection of washrooms will be scheduled, depending on occupancy loads.
-)] Post cleaning schedule and consider adding cleaning staff and making them visible to guests if they have any questions or concerns related to COVID-19.

3.10 Retail

Many Snow Resorts have retail concessions or contractors providing services on the snow resorts property. Some retail areas should consider the following changes under COVID-19:

-)] Providing barriers at cash register and counter.
-)] Method of managing clothing or equipment that's tried on/or touched.
-)] Cashless payment methods.
-)] Curbside pick-up and/or drop off for services.
-)] Signage, communication, and information updates on service delivery due to COVID-19 in store, website, and social media.
-)] Cleaning of high touch surfaces and equipment (may include rentals).
-)] Reduction of in-stores per person or group capacity

Any Snow Resort Operator offering retail operations should follow guidelines applicable to their jurisdiction:

Retail Council of Canada: [ctrl click for information & resources](#)

Ontario: [ctrl click for information & resources](#)

See section 3.5.1 regarding payment processes and section 3.6 for line ups.

3.11 Rental Operations/Guest Use of Equipment

- J The rental facility should refer to physical distancing and cleaning measures outlined in this document.
- J Update cleaning, maintenance logs, and rental rotation schedules to include requirements for COVID-19.
- J Provide additional hand sanitization stations at high touch points areas (boot areas, helmet areas, and counter spaces).
- J Provide additional PPE and face shields to staff in the event that physical distancing can't be achieved.
- J To allow for physical distancing, Snow Resorts should consider the guest flow (waivers, trying on boots, binding adjustments, payment) to ensure physical distancing and minimize waiting and line ups.
- J To reduce cross contamination, separate areas for pick up and drop off should be established. All rental equipment will be sanitized between users; the sanitizing process will be determined based on the manufacturer's recommendations.
- J Where available, encourage advance on-line booking.
- J Consider decontamination area for drop-offs relevant to guest volumes, venue layout and staff availability to clean as rentals are returned, stowed and available for next cycle of use.
- J Consider allowing for more ventilation or air filtration in rental areas.

3.11.1 Repairs

- J Where possible, it is recommended that guests call in advance to book repairs.
- J Guest equipment (skis, snowboards) should follow the disinfectant protocols noted above for rental equipment, before and after service.
- J Curbside Pick-up and/or delivery.

3.12 Snow Programs

(only applies to Snow Resort Operators offering this service)

- J All participants must agree to the standard health conditions for visiting the Snow Resort (see Section 3.4 Guest Communications) including hygiene and sanitization protocols.
- J If a participant develops symptoms while in the program, the participant should be isolated until others in the participant's family or visitor group have been notified.
- J Follow provincial COVID-19 guidelines for childcare.

3.12.1 Lesson and Program Communication

Develop a pre-lesson communication plan, per Section 3.4 Guest Communications, which may include:

- Any policies restricting participation (i.e. COVID-19 symptoms)
- Any pre-screening the snow school has in place.
- Information on when to arrive and where to wait prior to lessons.
- Information about the lesson experience and what has changed due to COVID-19.
- Physical Distancing between staff and guests and when it can't be achieved during a lesson.
- Use of PPE, face coverings, goggles, and gloves for winter.

Changes or removal of food, beverage and other eating areas for full day programs.
Special consideration for toddlers or children under a certain age, as it might be difficult to meet the provincial requirements for daycare, sport camps and physical distancing.
Post signage and agreements where the snow resort may request the removal of individuals from the program if they are showing signs of COVID-19.

3.12.2 Meeting Areas

Set up meeting areas to allow for physical distancing (e.g. minimum 2 metre distance), based on provincial gathering requirements.

Use signage to direct guests to meeting areas.

Move as much of the experience to outdoor locations as possible.

Where possible, designate a specific entrance point and a specific exit point to and from the meeting area.

Instructors, coaches, and/or patrol to review and communicate COVID-19 requirements of the snow resort.

3.12.3 Lesson, Coaching, Events, and other Guided Operations.

As of the weeks of July 5th and 13th 2020, information on return to sport plans are being made available by International, National, Provincial, and other sanctioning bodies; see list of industry partners below:

Alpine Ontario [ctrl click for more information & resources](#)

Ontario Snowboard [ctrl click for more information & resources](#)

Canadian Ski Instructors Alliance (information pending) [ctrl click for more information & resources](#)

Canadian Association of Snowboard Instructors [ctrl click for more information & resources](#)

Cross Country Ski Ontario [ctrl click for more information & resources](#)

Alpine Canada (pending information) [ctrl click for more information & resources](#)

FIS [ctrl click for more information & resources](#)

-) At this time, if a Snow Resort has an affiliation with the list of organizations (above), work in partnership with them to start reviewing information and planning to meet new programming requirements under COVID-19.
-) Snow Resorts may have an opportunity to create new in-house programming during COVID-19 pandemic to better balance the needs of the guest and snow resort.

It is a shared responsibility to communicate with industry partners to work together to continuously develop and maintain protocols during the COVID-19 pandemic.

3.13.4 Snow Programming General Recommendations under COVID-19

Provide a safety introduction (i.e. physical distancing) for participants. Ensure guests know how to get up on their own, fasten and unfasten binding straps and unclick ski bindings prior to getting on the hill.

Refrain from physical touching e.g. do not shake hands, high five.

When physical distancing cannot be maintained, use alternate precautions such as face coverings and hand sanitization.

Consider teaching aids to enable physical distancing such as experiential/station teaching concept to programming for lower levels with parental assistance (i.e. terrain-based learning).

3.14 Safety, Patrol, and Security

-) First aid response at Snow Resorts can vary between operators and include support from local ambulance, first responders, Fire Rescue, Security, and/or professional and volunteer patrollers. All first responders of any kind should be trained to your COVID-19 related plan/protocols and are provided with appropriate PPE.
-) There are a number of organizations and standards that may apply depending on jurisdictions and business models.
-) Layout of First Aid Hut, Building, or Stations will need consideration for intake of symptomatic and non-symptomatic guests and consideration for triage and trauma.
-) Cleaning and sanitation procedures will need to be considered for all medical equipment, tools, and devices.
-) Procedures will need to be developed to facilitate the management of COVID-19 symptomatic guests. This should be done in partnership with the local health unit and transfer hospitals/clinics.
-) Procedures will need to be developed for first aid response to events under COVID-19 (if applicable to your snow resort).

See additional resources

Canadian Ski Patrol [Ontario Division(s)] [ctrl click for more information & resources](#)

St. John's Ambulance [ctrl click for more information & resources](#)

Canadian Red Cross [ctrl click for more information & resources](#)

The Canadian Centre for Occupational Health and Safety (CCOHS): [ctrl click for more information & resources](#)

3.15 Food and Beverage

Any operator wishing to provide food and beverage service **will follow all provincial and municipal regulations and national guidance** established for food and liquor services during COVID-19.

-) Providing barriers at cash register or counters.
-) Cashless payment methods.
-) Curbside pick-up and/or drop off for services.
-) Signage, communication, and information updates in kiosks, cafeterias, bars, and restaurant areas - this includes updating website, and social media.
-) Cleaning of high touch surfaces and equipment.
-) Reduction of per person or group capacity.
-) Spacing of line-work within the kitchen.
-) Spacing, design, layout, and capacity of seating areas.
-) Developing barriers within seating areas.
-) Menu development to help manage table-turnover relating to capacity and volume requirements.
-) Reservations system may need to be introduced to better accommodate capacity.
-) Increasing capacity with temporary structures to better manage capacity.

The following guides are the food and beverage industry recommended practices Snow Resorts can utilize:

Restaurants Canada Reopening Best Practices: [ctrl click for more information & resources](#)

The Canadian Centre for Occupational Health and Safety has produced a tip sheet, “Coronavirus (COVID-19) Tips – Restaurants and Food Services”: [ctrl click for more information & resources](#)

3.13 Accommodation

Accommodation offerings may or may not be operated by the Snow Resort Operator. In many of these communities, there is a wide range of tourist accommodation available from several different providers. Any accommodation provided by the Snow Resort Operator will comply with the most up to date COVID-19 prevention strategies for the accommodation sector mandated by local, provincial and/or federal authorities. The Snow Resort Operator should encourage all its accommodation partners to do the same.

Please see provincial hotel and accommodation associations for specific measures and guidance related to accommodations. See Hotel Association of Canada for more details and links: [ctrl click for more information & resources](#)

END OF DOCUMENT

Appendices to follow

Appendices

Appendix 1: Links

Public Health Links:

| | |
|---------------------------------|--|
| Public Health Service of Canada | www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection.html |
| Alberta | https://open.alberta.ca/dataset?q=covid&sort=score+desc&pubtype=Orders+and+Directives&tags=COVID-19 https://www.alberta.ca/coronavirus-info-for-albertans.aspx |
| British Columbia | www2.gov.bc.ca/gov/content/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/current-health-topics/covid-19-novel-coronavirus |
| Manitoba | www.gov.mb.ca/covid19/soe.html |
| New Brunswick | www2.gnb.ca/content/gnb/en/departments/ocmoh/cdc/content/respiratory_diseases/coronavirus/resources.html |
| Newfoundland and Labrador | www.gov.nl.ca/covid-19/alert-system/public-health-orders/ |
| Northwest Territories | www.gov.nt.ca/covid-19/en/public-health-orders |
| Nova Scotia | novascotia.ca/coronavirus/alerts-notice/#provincial-state-emergency |
| Nunavut | gov.nu.ca/health/information/covid-19-novel-coronavirus |
| Ontario | covid-19.ontario.ca/ |
| Prince Edward Island | www.princeedwardisland.ca/en/topic/covid-19 |
| Quebec | www.quebec.ca/en/health/health-issues/a-z/2019-coronavirus/ |

| | |
|--------------|--|
| Saskatchewan | www.saskatchewan.ca/government/health-care-administration-and-provider-resources/treatment-procedures-and-guidelines/emerging-public-health-issues/2019-novel-coronavirus/public-health-measures/public-health-orders#current-public-health-orders |
| Yukon | yukon.ca/en/health-and-wellness/covid-19-information/latest-updates-covid-19/current-covid-19-situation |

Worker Safety Directives & Resources

The provincial agencies are listed below:

| | |
|--|--|
| Canadian Centre for Occupational Health & Safety | www.ccohs.ca/products/publications/covid19/ |
| Worker's Compensation Board of Alberta | www.wcb.ab.ca/about-wcb/news-and-announcements/COVID-19.html |
| WorkSafeBC (Workers' Compensation Board of BC) | www.worksafebc.com/en/about-us/covid-19-updates |
| Workers Compensation Board of Manitoba | www.wcb.mb.ca/how-the-wcb-is-responding-to-covid-19 |
| WorkSafe NB (New Brunswick) | www.worksafenb.ca/safety-topics/covid-19/covid-19-what-workers-and-employers-need-to-know/ |
| WorkplaceNL (Newfoundland & Labrador) | www.workplacenl.ca |
| Workers' Compensation Board of the Northwest Territories and Nunavut | www.wscn.nt.ca/health-safety/covid-19 |
| Workers' Compensation Board of Nova Scotia | www.wcb.ns.ca/covid19.aspx |
| Ontario-Ministry of Labour, Training, & Skills Development | https://www.labour.gov.on.ca/english/hs/index.php |
| Ontario-Workplace Safety Prevention Services | https://covid19.wsps.ca/ |
| Ontario-Workplace Safety & Insurance Board | www.wsib.ca/en/novel-coronavirus-covid-19-update |
| Workers' Compensation Board of Prince Edward Island | www.wcb.pe.ca/COVID19 |
| Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST Quebec) | www.cnesst.gouv.qc.ca |

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| Saskatchewan Workers' Compensation Board | www.wcbsask.com/employers/covid-19-and-the-workplace/ |
| Yukon Workers' Compensation, Health and Safety Board | wcb.yk.ca/COVID-19.aspx |

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