



**Announcer:**

It's time for the *IHSA Safety Podcast*.

**Ken Rayner:**

Welcome to the *IHSA Safety Podcast*. I'm your host, Ken Rayner. On today's episode, we're going to hear about a construction firm whose occupational health and safety management system achieved COR® certification, successfully transitioned to the COR® 2020 standard, and was recently recognized by the Ministry of Labour, Immigration, Training, and Skills Development under the Supporting Ontario's Safe Employers program.

Established in 1927, Bothwell-Accurate employs over 300 professionals, focusing on waterproofing, architectural metal, and roofing project requirements. Since being established almost a century ago, Bothwell-Accurate has completed more than 60,000 projects across Ontario and British Columbia. And to share the story with us, I'm very pleased to welcome to the *IHSA Safety Podcast*, Carlo Colozza.

**Carlo Colozza:**

Hey. Good morning, Ken.

**Ken Rayner:**

Hey. Good morning, Carlo. Thanks for being here. Carlo is Bothwell-Accurate's Corporate Health and Safety Manager, and it's great to have him here to tell the story. Thanks for being with us, Carlo.

**Carlo Colozza:**

Thank you.

**Ken Rayner:**

All right, Carlo. Let's get into it. How about you share the story of how Bothwell-Accurate's occupational health and safety management system became certified to the Ontario COR® standard?

**Carlo Colozza:**

Back in 2016 was our first attempt at COR®. And like many other firms or employers, we didn't really know much about it. It was new to Ontario—it's still relatively new to Ontario—and new to us. Like a lot of firms, we were unsuccessful. Prior to that, there was no COR® in Ontario. There was no audit system that a construction firm could use to audit their system, so we made an attempt based on what we had in place for our occupational health and safety management system, and we identified the gaps.

**Ken Rayner:**

Do you remember what some of those gaps were that were the “biggies”—that maybe prevented you from becoming certified that first time?

**Carlo Colozza:**

I believe a lot of it was employee engagement. That was just one that stands out. We've always had a good handle on training. And the documentation part of it—just keeping everything documented. That was one of the major ones.

**Ken Rayner:**

Okay. Yeah, I can appreciate that. The first time that employees go through an audit and they're being questioned on policies, practices, and procedures, it can sometimes be a little overwhelming. It can sometimes cause a bit of stress. But I think the more times you go through it and the more times you feel comfortable speaking to someone about the system, the easier it gets.

**Carlo Colozza:**

Yeah. And we also found that when they hear the word ‘audit,’ they get all panicky. And I go, “No, this is not a CRA [Canada Revenue Agency] audit. You're not going into finance—we're looking at our system. We're looking to see where the gaps are and how to improve. You're not going to fail the company. Don't worry.” So there was a lot of hand-holding and a lot of reassuring, especially with managers. They knew nothing about it because they felt that if they said the wrong thing, it could fail the audit. COR® has never been about that. It's about ‘find the gap, fix the issue, and move on’.

**Ken Rayner:**

Right.

**Carlo Colozza:**

Right?

**Ken Rayner:**

Yep.

**Carlo Colozza:**

And that's it. And that's what we do today.

**Ken Rayner:**

Excellent.

**Carlo Colozza:**

And everyone's pretty comfortable with the COR® audit process today.

**Ken Rayner:**

Originally, I take it you were certified to the 2015 standard. You have recently successfully transitioned to the COR® 2020 standard—I believe in 2023. So can you maybe walk through what Bothwell-Accurate's preparation was for the transition to COR® 2020?

**Carlo Colozza:**

Bringing me in, I had a good, solid background in COR®. Prior to coming to Bothwell-Accurate, I had been part of the WSIB [Workplace Safety and Insurance Board]'s Health and Safety Excellence program (HSEp), which really prepares you for certain topics in COR®. So I almost felt like I had the leg-up, or I was ahead of the game. It helped me transition. I already had policies pre-written and ready to go. When I came over, I saw what was missing. I did a gap analysis on the program, and I knew right away what was missing. So I implemented the changes.

**Ken Rayner:**

And can you describe some of those things that were missing?

**Carlo Colozza:**

Document control and records is the big one. Having a policy, for example, for health and safety communication and health and safety training. Creating a specific training profile for every job or every position that we have in the company, just to start. And I found that there were processes in place, but they were just never documented. That was the big thing I found.

You know what I mean? Yeah, this is what we do. And they could spit out what they do. But okay, where does it say that on paper? 'Well, we don't have that.' Well, okay, I'm happy that the process is in place, but let's put it on paper. So that was an easy transition.

I find that a lot of firms out there have processes in place, and the big thing is they don't put it on paper.

**Ken Rayner:**

Absolutely. I think we've had other guests say the same thing.

I've heard Chris McKean, our Vice President that's in charge of the COR® program, say the same thing. Most organizations are doing the work. The work is getting done, and people know what they need to do. The question is, is it documented? And I think the next question after that is, is it consistently applied across the workplace? Because if you don't have something documented, it's really challenging to make it consistent. If you've got 10, 20 projects going on at once—if you've got even three projects going on at once—how do you ensure consistency unless there's documentation?

**Carlo Colozza:**

Exactly. And that's helped me with our operation out in B.C. [British Columbia]. I know they have a different COR® standard out there but they often are like, "Okay, what's your process? Do you have a procedure or program on training communication?" Yeah, here it is. It's based on the higher standard within the country. This is what we go with.

**Ken Rayner:**

All right. Maybe we could talk a little bit about the transition from 2015 to 2020, because we know that it's not just a straightforward "Hey, this is easy, just go through it, no problem." There are some obstacles and challenges. And what were some of those that you encountered?

**Carlo Colozza:**

That's a good question because, honestly, I didn't encounter very many challenges, because I knew what I needed to do. I go into an audit knowing that I'm going to pass. And anything that I come across, I'm going to fix. So to me, because I've been at it so long, it's a pretty simple process now. It's work for sure. It's a lot of work, but I'm not afraid of a lot of work. Let's get it done. Let's get it done on behalf of the company, and let's push the higher standard.

**Ken Rayner:**

I love the mindset, Carlo, because I think there are absolutely distinct ways that you can approach an audit. If you're going, "Hey, this is going to be successful and even if we come across things, it's still going to be successful, because we've uncovered something that needs to be fixed." And then you have an opportunity to fix that. As opposed to "Oh, we've got a problem. This is going to be catastrophic. We don't want to run into any problems during an audit." Well, why not? Why don't you want to uncover those things during an audit, as opposed to recognizing it when an incident occurs?

**Carlo Colozza:**

Yeah. Exactly. And that's what I usually tell whoever I'm working for. With Bothwell it was pretty easy. And they knew. They always wanted to achieve the higher standard. But my suggestion or my advice to anyone going through the process: let the owner know that it is a process. We're going to find things, but we're going to fix it, and then we're going to improve. Don't worry about how the company is going to look, because no company is perfect. Even when you achieve your 100 per cent on corrective action, there's still ongoing issues. There are still things that you're going need to fix. It's an ongoing process. So let's just get COR®—COR® 2020—and just keep to the higher standard.

**Ken Rayner:**

Right on. Let me ask that last question a different way: since you didn't come across a lot of obstacles or challenges that you saw in transitioning, what do you think IHSA could do differently? What information or service could IHSA provide that would make the transition more straightforward for more organizations?

**Carlo Colozza:**

I think if you want auditors to be successful, then you have to them complete an audit. It's one thing to have to do an auditor training course at the IHSA, which I believe is only half a day. It's not enough time. It doesn't prepare you. I've had a couple of people who work for me and I said, "Is it anything like the training, this audit? Did the training help?" And, to be honest, it's nothing like the training. They need to get their hands dirty, basically. They need to get in with the audit. They have to read every question, go through the guidelines, go through the COR® standard and truly understand it. I also recommend, when doing your first audit, do it in a group setting. If you have the ability, do it in a group so you can bounce ideas off one another.

The other thing is to reach out to your network—your health and safety network—people who have been in the business for quite a number of years. Ask around: what are your challenges; what have you encountered?

Finally, I would ask the IHSA consultants, such as Peter Smith and John Kellie, who have been nothing but an amazing support for me all these years.

**Ken Rayner:**

Fantastic, Carlo. It's interesting to think back to about seven or eight years ago, when we were doing some surveys on companies that were becoming COR® certified at the time. We asked them, "If you had a chance to start this whole process over again, what would you do differently?" The number one response they gave was "we would've asked more questions of IHSA." And for whatever reason, I think, firms just don't reach out as much. Maybe they don't feel they can ask the question; maybe they don't feel it's something they can pose to IHSA. Reach out. Ask the question. We want those questions coming in.

**Carlo Colozza:**

Yeah, I think you said it right there. They're probably fearful. What is the IHSA going to find? But IHSA is not like that. They want to help. They want to help you be successful. And when people hear the word "audit", like I said previously, they think a CRA [Canada Revenue Agency] audit. It's not that type of audit. It's a compliance audit, but it's not a CRA audit. You're not going to be paying back the government or the IHSA anything. It's just about continuous improvement; how to make things better. So if you can get that out of your head, it goes a long way. To me, it has always been a mindset.

**Ken Rayner:**

I love your comment—it's certainly helpful when an auditor actually conducts an audit. So if someone is coming in and just taking the training first, and they've actually never gone through an audit, it can be somewhat challenging. If you and I were teaching a class on swimming to a whole bunch of people that have never been in the water before, we could tell them all about it theoretically. But until you immerse yourself in water, it's really challenging to understand the experience of swimming.

**Carlo Colozza:**

Exactly. Exactly.

**Ken Rayner:**

I think that there are probably some challenges in terms of taking in that training, trying to apply it and understand how it's going to work. But until you go through an audit at least once, it's not as clear.

**Carlo Colozza:**

Yep, exactly.

**Ken Rayner:**

Because you said, "Look, I didn't really have any challenges with the audit." It's more about how did you understand the requirements between the two? I know you talked about going into that Health and

Safety Excellence program, right? So how was Bothwell-Accurate able to really clearly understand the requirement for making the transition and the different structures between the two standards? And I know you said "hey, we didn't have that big of an issue," but you must have had a process for doing it.

**Carlo Colozza:**

Okay. My process there was, again, I reached out to my IHSA consultants. Huge help.

**Ken Rayner:**

How did they help you? How did John [Kellie] or Peter Smith help you?

**Carlo Colozza:**

Basically, he gave me the tools. Okay, go through the audit tool and basically say, "Well, this question, you got to link it up with that question." They provided a roadmap on "this section here applies to the procedure, this section, it has to be... these other points need to be in your policy and procedure." So they broke it down in a way where he told me where things needed to go.

**Ken Rayner:**

Was that one conversation, or were there multiple conversations that you had with him over the period of the transition?

**Carlo Colozza:**

That one particularly was with John Kellie, and that was just basically one conversation. He sat down with me and went through the audit tool and said "Yeah, this is what you need to do." And I understood it. It just cleared everything up.

**Ken Rayner:**

Okay. So based on your experience—and I appreciate reaching out to IHSA being one of the things—what other advice would you share with companies who are in the process of transitioning? So they already have COR®; they need to transition to COR® 2020. What are some things that they should do that would help them in their process besides reaching out to IHSA?

**Carlo Colozza:**

Read the audit carefully—line by line. Understand the guidelines; ask questions. Like I said before, WSIB's HSEp program helped me tremendously.

**Ken Rayner:**

Okay. Now, we're talking about Bothwell-Accurate's occupational health and safety management system and it being certified. This is your system—it is Bothwell's system. So since the system's become certified, and you've had a recognized system in place across all of your properties in Ontario, what are some of the improvements, benefits, or positive changes that you've witnessed within the workplace, Carlo?

**Carlo Colozza:**

I think we're better-organized. We know where everything is. We have solutions for any issues that come up. It enables us to bid on work. A lot of the municipalities require COR® certification. What else? We're able to process documents a lot better. Like I said, keep things organized. For the most, part that's pretty much what it's done.

But the big thing would be being able to bid on work. COR® provides us with a better reputation out in the construction sector. Our clients require it. Our clients want to see that we're working safely, because they want to work with other companies who work safe; who have processes in place. So it has improved our reputation, put it that way. Even though we had a really good reputation, it just basically continued to further our reputation within the industry. Say, "Hey, there's Bothwell. They're doing it again. They're setting the standard. "

**Ken Rayner:**

Right on. And there's another standard we want to talk about: your recent recognition under the SOSE program with Ontario's MLITSD for having a certified occupational health and safety management system based on the COR® 2020 standard. So, Carlo, congratulations again for that. Can you describe the processes? We have hundreds of COR®-certified, COR® 2020-certified systems out there that are eligible to apply and receive the benefits of the program. So maybe you could describe the process and whether or not you would recommend others to do the same.

**Carlo Colozza:**

Well, honestly, it was pretty straightforward, right? I think, first and foremost, you need to complete the 2020 audit. That's the first thing. Second, your corrective actions need to be 100 per cent complete before you submit it to the Ministry with the application. Third, your auditor—or you have to hire a third-party auditor. I recommend the auditor who did your external audit follow-up on those corrective actions. We just have to submit this information to the Ministry. [The auditor] validates our corrective actions in another report. I attach it to the application, and I submit it to the Ministry for review.

And, to be honest, the hardest part about the whole process was waiting for it to be reviewed. The Ministry are doing their best. They only have limited resources in this department to review these applications. So I submitted it in November 2023, and I didn't get final word until July 2024. So I kept in touch. They were really good at giving an update: "this is where we're at" or "we're not there yet." But I knew it was going to get done. I was going to get an answer.

But I also kept in touch with Peter Smith at IHSA. He helped a lot. I think he went to IHSA management, and I think they might've inquired to where [the Ministry] were at with Bothwell's submission, because I understand we want to use COR® as a tool to achieve this. And I believe we're only the second company in Ontario to do this. So there's an interest from the IHSA to sell their audit tool to the Ministry. It's a higher standard, versus the ISO 45001. So it was a collaborative thing, which I appreciate.

**Ken Rayner:**

Right. Well, I appreciate that. And in terms of what you talked about earlier about going through an audit and finding those opportunities and getting them all corrected, the submission doesn't seem like anything that's really outside of what you would want to do anyways to close out your audit. So you

have your audit, you get certified to COR® 2020. There are some deficiencies that are recognized in terms of "Hey, you need to look at these and correct these issues." You'd want to get them corrected anyways, because you'd want to address them. They've been identified as issues. You correct them and then you just submit it to the Ministry. So it sounds like it's a fairly straightforward process. As you said, the worst part is waiting.

**Carlo Colozza:**

Yeah. It is. And then the best thing: if you submit your audit 100 per cent complete, there's a financial rebate, which we received recently. It was a sizable rebate. That's money that Bothwell-Accurate didn't account for, but they were happy to see it. It's money put back into our program here.

**Ken Rayner:**

Excellent. Yeah. That's great. Just keep investing; keep re-investing. Excellent.

**Carlo Colozza:**

Exactly.

**Ken Rayner:**

Carlo, as a member of Bothwell-Accurate's management team, how has having a certified OHSMS provided you with the confidence that the hazards in your workplace have been addressed with the most appropriate controls and ensuring that your workers return home healthy and safe at the end of each workday? How important is that?

**Carlo Colozza:**

Very important. We have to provide the ability for our workforce to recognize hazards, right? There has to be a process in place. They have to have a voice on how to identify and address any safety concerns. So our program provides that ability. It's a continuous process. It's continuous reminding that'll never stop. But it is very important that we keep the open lines of communication.

**Ken Rayner:**

If you had a 16-year-old child that could go and work in the construction industry in the summertime, would you, knowing what you know, feel comfortable if they went and worked for a company that was not COR® certified?

**Carlo Colozza:**

No, I would not be comfortable with it. It's a dangerous business. I'd definitely be concerned. And I'd like to have them work for a company that's COR® certified, just because I know this process is in place. If my son came to me and said, "Well, here, this is what this contractor's doing." Well, here's the avenue you need to go. If they don't have that process in place, then we need to talk, my son and I. If they do, okay, this is what you need to do: you need to speak to the supervisor. They need to escalate it. I understand the process, and I will lead my son in that direction.



**Ken Rayner:**

Yeah, I feel the same way. I think that's a great test: when you really think about your children, who you love, would you let them go work for a company that doesn't have a certified system? I know for me, no. When our son looked into the construction industry this summer coming back from university, and he wanted to work in construction, I said: "That's great. You've got my support. It's an amazing industry, and it can be extremely rewarding. Tons of variety. But you've got to go work for a company that's COR<sup>®</sup> certified. It's the only way that I'm going to feel safe while you're working during the day."

**Carlo Colozza:**

Exactly.

**Ken Rayner:**

Yep. Excellent. Hey, Carlo, thank you so much for being with us. We appreciate you sharing your experience and your story. Bothwell-Accurate's story. A pleasure to have you on the podcast. Thank you so much.

**Carlo Colozza:**

Well, it was a pleasure. Really enjoyed the opportunity to speak with you.

**Ken Rayner:**

And thank you to the listeners for listening to the *IHSA Safety Podcast*. Be sure to subscribe and "like" us on your podcast channel, and visit us at [IHSA.ca](http://IHSA.ca) for a wealth of health and safety resources and information.

**Announcer:**

The *IHSA Safety Podcast*. For more episodes, tips, and all things safety, go to [ihsasafetypodcast.ca](http://ihsasafetypodcast.ca). Thanks for listening.



