

HEARING CONSERVATION

Program Guideline

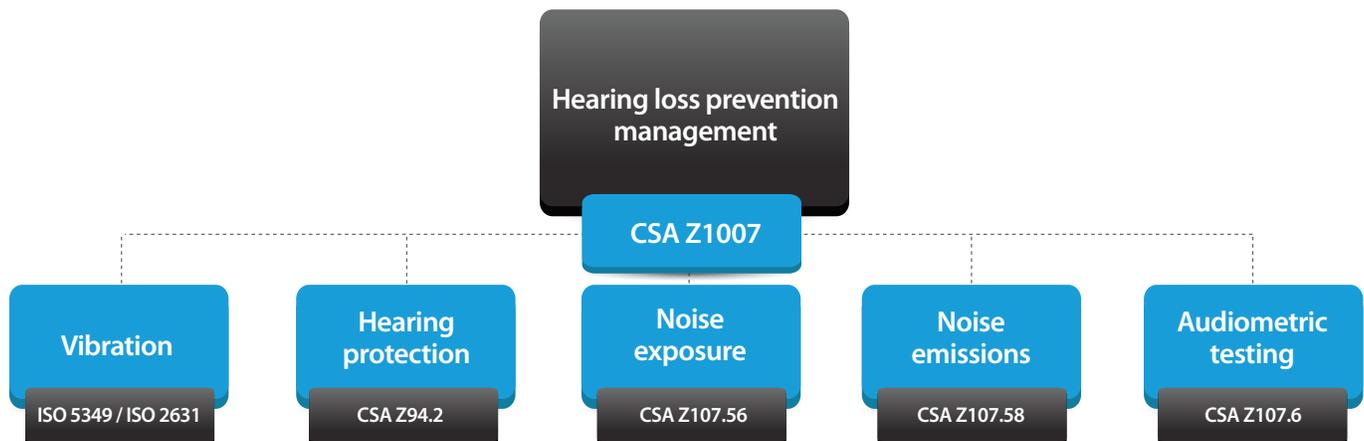


Implementing hearing conservation best practices.

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Hierarchy of hearing conservation standards



Hearing Conservation Program Guideline

1.0 Disclaimer/References

The information presented is subject to jurisdictional variation and is always subject to change. Individuals or organizations responsible for working with the information presented are responsible for ensuring that all applicable standards and regulations are fulfilled. The information presented cannot and should not be considered a definitive guide to government regulations nor does it relieve individuals or organizations using the information from their responsibilities under any or all applicable legislation. These materials may not be altered or changed without permission from WorkplaceNL.

This guide is based on Occupational Health and Safety Regulations s. 68 and Canadian Standards Association (CSA) standards Z107.56-18 (Measurement of noise exposure) and CSA Z94.2-14 (Hearing protection devices - performances, selection, care and use).

The CSA standard Z107.56-18 (Measurement of noise exposure) is not covered in its entirety, users of this guide must consult the standard for circumstances that are not addressed in this guide, including octave band analysis, microphone in real ear (MIRE), manikin or artificial ear measurements, at-ear sound measurements, using integrated sound level meters to measure full shift exposure, etc.

Elements of CSA standard Z1007-16 (Hearing loss prevention programs) and CSA standard Z107.6 (Audiometric testing for use in hearing loss prevention programs) are included in this document as best practices. These standards are not enforced through the Occupational Health and Safety Act.

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2.0 Introduction

HCP

A Hearing Conservation Program (HCP) sets the minimum requirements for the selection, use, and care of hearing protection in order to keep noise exposure below occupational exposure levels and prevent occupational hearing loss and tinnitus.*

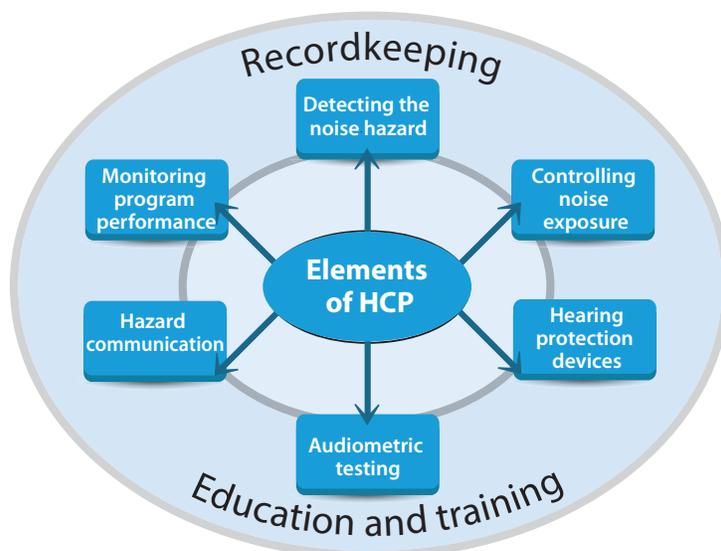
*Tinnitus. The perception of ringing or other noises in one or both ears in the absence of an actual sound. <https://chha-nl.ca/your-hearing/signs-of-reduced-hearing/tinnitus/>

Best Practice

An HCP should state the purpose of the program and include the employer's commitment to:

- Protect workers hearing through the implementation and maintenance of the program.
- Ensure the use of controls adheres to the hierarchy of controls and that only qualified individuals will select the controls.
- Consult and cooperate with the OHS Committee, Workplace Health and Safety Representative, or Designate on all matters.
- Communicate, educate and train workers, contractors and visitors on the present and potential hazards they may encounter in the workplace, and identify the controls they can take to protect themselves.
- Provide the necessary resources to implement, maintain and improve the program.
- Develop a process to monitor, evaluate and improve the program as needed.

Hearing Conservation Program Elements (HCP)



3.0 Roles and Responsibilities

Roles and responsibilities outline expectations and provides clarity to those performing the work. The result is effective communication between various groups and the integration of an HCP into an existing Occupational Health and Safety (OHS) program.

Employers

When working in an area where noise levels exceed the American Conference of Governmental Hygienists (ACGIH) noise threshold limit values (TLVs), employers must take action to reduce noise to acceptable levels or isolate workers from the noise.

When this is not practical, employers must make sure that workers wear hearing protection that meets CSA standard Z94.2 (Hearing protection devices – performances, selection, care and use) and is appropriate for the level of noise. If an area requires people entering it to wear hearing protection, signs must be posted at the entrance stating the hazard and the required hearing protection.

Employers must also make sure the workplace is assessed for noise hazards. If workers are exposed to noise above the ACGIH TLVs, an HCP should be established that includes:

- Noise assessments to identify high-noise areas and tasks. This must be performed by a qualified person, in accordance with CSA standard Z107.56 (Procedures for the measurement of occupational noise exposure).
- Hearing tests for exposed workers:
 - Within three months of starting employment
 - Annually
 - When recommended by an audiologist or occupational physician
- Training and education for workers in the health hazards of noise and the fitting, maintenance, care and use of hearing protection.

Best Practice

CSA standard Z1007-16 (Hearing loss prevention programs) requires employers to assign a qualified person to the role of program administrator for an HCP.

3.1 Program Administrator Responsibilities

A program administrator is responsible for managing the HCP including correcting deficiencies, enforcing compliance, and advising management when a change or resource is required. This role is not a mandatory part of an HCP, but is recommended.

Program administrators must:

- Make sure those assigned roles in the program are qualified and have the training necessary to carry out their roles.
- Confirm the qualifications of external service providers if required.
- Ensure the required controls are in place and maintained, including worker education and training.
- Ensure hearing tests are performed in accordance with the program.
- Ensure that corrective actions are taken when changes to worker exposure are identified, and after hearing tests are reviewed, or an incident investigation.
- Ensure that workplace assessments and control plans are communicated.
- Ensure the HCP and hearing conservation report are reviewed at least annually. It is legislated that the OHSC review the results of testing as a whole, but not individual records.

- Update and communicate changes to the HCP as needed.
- Maintain records for the HCP.

3.2 Supervisor Responsibilities

Supervisors must make all reasonable efforts to protect the health and safety of workers under their supervision. This includes advising them of present and potential workplace hazards, and providing written or oral



instructions on safety precautions that must be followed. They must also make sure that the workers use the required hearing protection.

Best Practice

Notify the program administrator of any worker concerns regarding high-noise areas or tasks, control methods, hearing protection, and hearing tests.

3.3 Worker Responsibilities

Workers must take reasonable care to protect their health and safety and that of others at or near the workplace. This includes wearing hearing protection and using safeguards and safety devices according to their training and the manufacturer's instructions. Workers must participate in training and hazard assessments and only use equipment or perform tasks in which they have been trained. They must also follow all safe work practices and report any concerns and hazards to their supervisor or employer. This includes reporting conditions that could impair their ability to safely use hearing protection.



3.4 Contractor Responsibilities

Contractors must comply with the Newfoundland and Labrador Occupational Health and Safety legislation, including the development and implementation of an HCP, if applicable.

Best Practice

Notify the contract manager of incidents where the use of hearing protection could have prevented or contributed to an incident.

4.0 Risk Assessment

Employers must make sure the workplace is assessed to identify high-noise areas, equipment and tasks. Assessments must be performed by a qualified person, in accordance with CSA Z107.56 (Procedures for the measurement of occupational noise exposure).

A risk assessment includes a noise survey and personal dosimetry. The assessment results must be used as the basis of the HCP, including the selection of appropriate control methods and hearing protection. Re-assessments should take place when there is a change to the noise levels or occupational exposure limits and in accordance with the HCP's assessment schedule.

4.1 Noise Survey

A noise survey uses an integrating sound level meter to identify high-noise areas, equipment and tasks. Its results can help determine if engineering or administrative controls are needed and determines their effectiveness. This data alone should not be used to determine worker exposure or to determine requirements for hearing protection. An integrating sound level meter must meet Class 2 or better tolerance in accordance with IEC 61672 or ANSI/ASA S1.4.

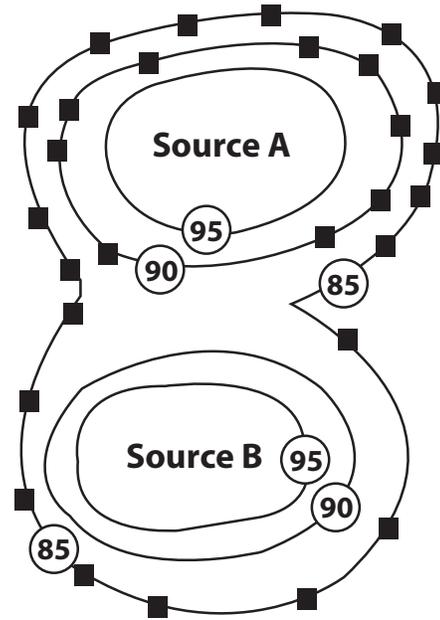


4.2 Personal Dosimetry

Personal dosimetry devices measure a worker’s exposure to noise during their shift. These devices show real-time exposure levels and can log data and perform automatic calculations. A personal dosimeter must meet Class 2 or better tolerance in accordance with IEC 61672 or ANSI/ASA S1.4.

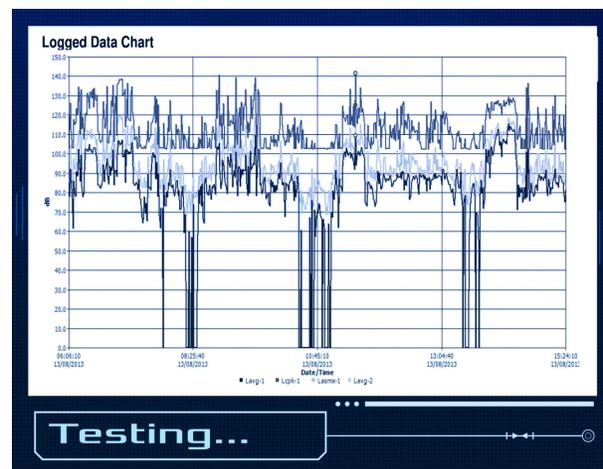


Sample noise survey map



■ Points of measurement

Personal dosimetry determines a worker’s exposure and can also be used to select the appropriate type of hearing protection for that worker. The results can also be used for groups of workers with similar exposure.



4.3 Permissible Exposure Limits

ACGIH TLVs refer to sound pressure levels and durations of exposure that represent conditions under which it is believed that nearly all workers may be repeatedly exposed without adverse effects on their ability to hear and understand normal speech. Table 1 is based on the 2020 ACGIH TLVs for audible sound. ACGIH TLVs and BEI's manual should be consulted each year TLVs are subject to change.

Hearing protection is required if workers exceed the permissible exposure in Table 1 for continuous, intermittent, or impact noise at or above 140 dBC.

The ACGIH also indicates that there is evidence that noise exposure in excess of an 8-hour TWA of 115 dBC or a peak of 155 dBC beyond the fifth month of pregnancy, may cause hearing loss in an unborn child.

Table 1. ACGIH TLVs for Audible Sound

Duration per Day (hours)	Permissible 8-hr Exposure (dBA)
24	80
16	82
12	83
10	84
8	85
4	88
2	91
1	94
0.5	97

Notes: For shift durations not represented, the permissible exposure must be adjusted.

4.4 Communication

Employers or program administrators must inform workers of the results of noise assessments and control plans. Results must also be shared with management, the OHS Committee, Workplace Health and Safety Representative, or Designate.

Recordkeeping

Employers or program administrators must keep records of noise assessments for as long as a worker remains employed. The worker can request these records upon termination of employment.



4.5 Frequency of Assessment

Noise assessments must be repeated when there is a change to the noise levels or occupational exposure limits and in accordance with the HCP's assessment schedule.

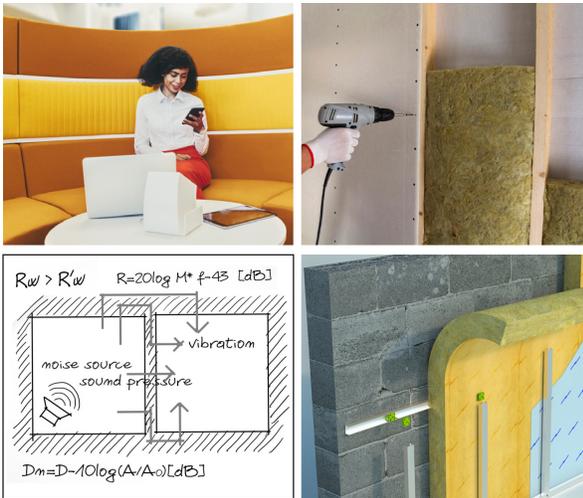


Best Practice

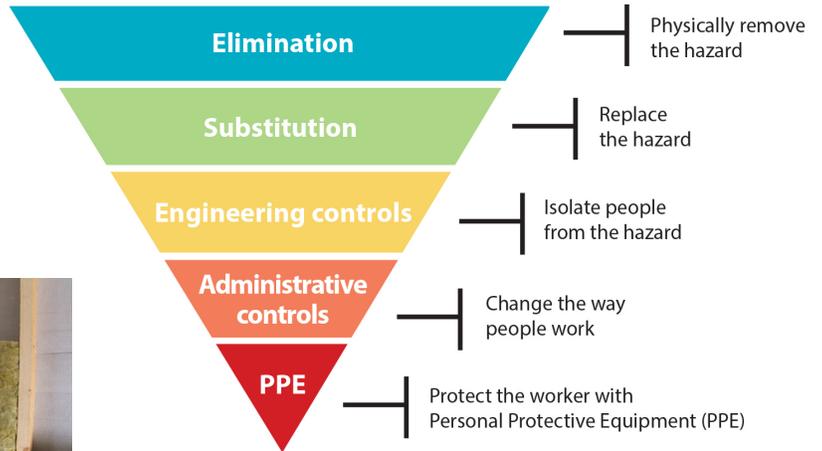
CSA Z1007 (Hearing loss prevention program management) recommends a minimum noise reassessment schedule of every two years.

5.0 Control Methods

Where practical, engineering and administrative controls must be used to eliminate or reduce noise exposure at the source. When this is not practical or fails to reduce exposure to acceptable limits, workers must wear hearing protection.



Hierarchy of Controls



- o Adding absorptive materials to dead spaces between the source and the worker.
- o Increasing the mass of materials between the source and the worker.
- o Installing sound dampening materials to reduce both vibration and sound transmission instructions on safety precautions that must be followed. They must also make sure that the workers use the required hearing protection.

5.1 Elimination and Substitution

Eliminating or replacing noisy equipment or tasks.

5.2 Engineering Controls

Engineering controls require a physical change to the workplace that either reduces noise at the source or along the path of transmission. Examples include:

- Enclosing noisy processes or equipment.
- Enclosing workers, such as operator booths.
- Changing the building design to reduce the transmission of sound.
- Using sound proofing techniques, such as:
 - o Decoupling walls and ceilings to decrease sound transmission to adjacent spaces.

5.3 Administrative Controls

A hearing conservation program is the primary administrative control for limiting noise exposure.

5.3.1 Reduction of Duration of Worker Exposure

Job-related hearing loss is due to two factors; noise level and duration. Reducing the length of time workers are exposed to noise using job rotation can reduce exposure below permissible limits.

5.3.2 Preventative Maintenance

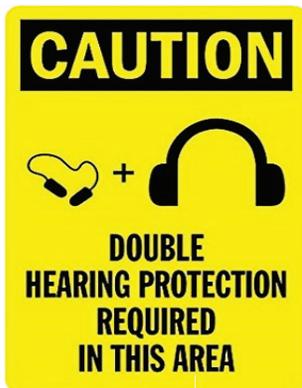
Preventive maintenance programs ensure that tools and equipment are maintained in accordance with the manufacturers' specifications. In addition to reducing noise, this helps prevent failures and increase the tool's service life.

5.3.3 Purchasing Practices

When purchasing new tools and equipment, review the manufacturer's noise and vibration performance data. Retrofit existing tools and equipment with noise control devices such as mufflers, silencers, special nozzles, or isolators.

5.3.4 Warning Signs

Always post signs at or near entrances where hearing protection is mandatory. Signage must conform to CSA Z321 (Signs and Symbols for the Workplace) and clearly state that a noise hazard exists and the required PPE.



6.0 Hearing Protection

When engineering or administrative controls cannot eliminate or reduce noise levels below the permissible exposure limit, hearing protection must be provided.

Hearing protection should be inspected before use and replaced if needed. It should also be cleaned and stored according to manufacturer's instructions.

Hearing protection must be selected in accordance with CSA Z94.2 (Hearing protection devices - performances, selection, care and use).

For exposures at or below an 8-hour TWA of 105 dBA, a combination of the noise reduction rating (NRR) and attenuation class of the hearing protection will be used.

What happens if you remove your earplugs occasionally?

Time removed (min)	25 NRR hearing protection is reduced to (dB)
0	25
1	17
5	11
10	8
30	3
60	0

For exposures above an 8-hour TWA of 105 dBA, double hearing protection should be used (i.e. Class A earplugs combined with Class B or higher earmuffs).

In addition to the attenuation class and NRR, the following criteria should also be considered:

- Anatomical variations
- Comfort
- Communication needs
- Compatibility with other types of PPE
- Environmental factors
- Hearing ability of workers

6.1 Attenuation Class

Table 2 below is based upon the CSA Z94.2 (Hearing protection devices - performances, selection, care and use) attenuation classes of hearing protection.

Table 2. CSA Recommended Attenuation Class of Hearing Protection

8-hour Exposure (dBA)	Recommended Class
Less than or equal to 90	Class C
90-95	Class B
95-105	Class A
>105	Double hearing protection (Class A earplugs combined with a Class B or higher earmuffs)

6.2 Noise Reduction Rating

The noise reduction rating (NRR) is the level of noise attenuation expected to be provided when hearing protection is worn properly. For example, hearing protection with a NRR of 30 should reduce noise levels by approximately 30 dBA.

- Earplugs: $\text{Effective noise rating (dBA)} = \text{Leq} - [\text{NRR}(0.5) - 3]$
- Earmuffs: $\text{Effective noise rating (dBA)} = \text{Leq} - [\text{NRR}(0.7) - 3]$
- Dual Protection: $\text{Effective noise rating (dBA)} = \text{Leq} - [\text{NRR}(0.6) - 3]$

PPE Comfort

Factors affecting the comfort of earmuffs include weight, headband tension, ear cuff (cushion) pressure and ear cuff (cushion) padding.

Factors affecting the comfort of earplugs include size, shape (i.e. tapered or not) and the type (i.e. roll down foam, premoulded/push-to-fit, semi-inert, custom-moulded).

6.3 Comfort and Fit

Employers should provide a variety of sizes and designs as workers are more likely to use hearing protection that is comfortable and fits properly. Workers who cannot find hearing protection that fits them should notify their supervisor as custom moulded earplugs or an ear-fit test may be needed.

6.4 Communication Considerations

In a noisy environment, workers with normal hearing may find that hearing protection reduces background noise, making it easier to communicate and detect warning sounds. In a quiet environment, they may experience the opposite effect. Hearing protection should be selected to avoid overprotection and audible alarms should be assessed to ensure that they are adequately loud.

6.5 Compatibility with Other Required PPE

Always consider how hearing protection interacts with other types of PPE. For example, if a worker is required to wear hearing protection with a hard hat and full-face respirator, it may be better to use earplugs rather than earmuffs as they may not be able to get a good seal between the earmuffs and their ears.

6.6 Environmental Considerations

Environmental factors can affect the type of hearing protection that can be worn safely. For example, working in high heat and humidity can cause sweating which may make earmuffs uncomfortable. When working in the cold, earmuffs can help keep a worker's ears warm.

When working around chemicals, reusable earplugs, roll down earplugs and earmuffs may not be appropriate because of the increased risk of contaminants entering the ear. In these cases, advise workers of the importance of inserting earplugs with clean hands and cleaning reusable earplugs/ earmuffs before and after use. For concerns about the physical durability of the hearing protection in a chemical environment, consult with the manufacturer or supplier.

Where electrical hazards are present, non-conductive earplugs are suitable. In food manufacturing industries, earplugs with conductive bands are often used because they can be easily identified in foodstuffs using an X-ray device.

6.7 Worker with Reduced Hearing

Hearing protection may affect a worker with hearing loss' ability to communicate and require them to use specialized hearing protection that includes communication devices. They should be advised not to remove hearing protection to communicate, as this can further damage their hearing.



They may also find that hearing protection makes it difficult to recognize audible alarms. The volume of an audible alarm may need to be increased, and a visual signal or vibration added.

Advise workers with hearing aids that turning it off is not a suitable substitute for hearing protection. In some cases, these workers may need to be accommodated to areas or tasks where hearing protection is not required.



7.0 Hearing Tests

Hearing tests measure how well an individual can hear different frequencies of sound at different amplitudes (loudness). Testing is usually performed using an audiometer that plays a series of pure-tones through a headphone set. The worker is asked to indicate when they can detect the tone as the volume is slowly increased. The hearing threshold level for each tone is plotted on a graph, called an audiogram.

An audiogram can identify changes in hearing over-time. As hearing loss occurs gradually, regular hearing tests are vital for early diagnosis and intervention. Any limitations revealed by the test must be stated in the writing by the audiologist and provided to both management and the HCP administrator.

Best Practice

Audiometric testing must be performed in accordance with CSA Z107.6 (Audiometric testing for use in hearing loss prevention programs).

Testing should be performed by an audiologist or a technician working under the supervision of an audiologist.

Prior to testing, employees should be advised to avoid any unprotected high-noise exposure for 14 hours. They should also avoid alcohol, aspirin, caffeine, and nicotine consumption.

7.1 Baseline Testing

A baseline hearing test must be conducted within the first three months of employment. These test results should be used as a reference against which subsequent test results are compared.

7.2 Annual Follow-up

Annual follow-up testing is required for workers exposed to noise levels in excess of permissible exposure limit or where recommended by an audiologist or occupational physician.

7.3 Post-Incident Testing

If an incident occurs where workers are exposed to noise in excess of 115 dBA, post-incident testing should be conducted within 30 days.

7.4 Hearing Conservation Report

A hearing conservation report is a summary of the number of workers who have had baseline and annual hearing tests, and the number of tests that indicate a noise-induced shift in hearing when compared to the baseline. Employers should request a hearing conservation report from the audiologist after annual hearing tests are completed to help measure the HCP's effectiveness. For example, if 50 per cent of workers show signs of noise-induced hearing loss over a five-year period, it is likely that a hazard exists that has not been properly assessed and controlled.

8.0 Education and Training

Education and training on the use of hearing protection is mandatory for all workers exposed to noise in excess of the permissible exposure limit. At a minimum, training should cover the hazards of noise exposure, including early warning signs and symptoms, as well as the proper fit, use, care and maintenance of hearing protection.

Education and training should be part of the health and safety orientation provided to new workers and should be reviewed periodically. Anyone who has a role in the HCP should also get the training and education necessary to perform their duties.

9.0 Recordkeeping

HCP records include:

- Training records
- Noise assessment reports
- Maintenance and calibration records of noise assessment equipment, if necessary
- Hearing protection selection logic
- Annual hearing test reports
- Program evaluation checklists

Records must be kept for the duration of employment. Upon termination of employment, a worker may request a record of exposure.

10.0 Program Review and Evaluation

An HCP program must be evaluated annually, and if there is a change to legislation, CSA standards or occupational exposure limits. Refer to Appendix B for a Program Evaluation Checklist.

Best Practice

The program administrator is responsible for managing all HCP records.

11.0 Appendix A - Definitions

Acoustic Society of America (ASA) –

The purpose of the ASA is to generate, disseminate, and promote the knowledge and practical applications of acoustics

Administrative controls – Administrative controls eliminate or reduce exposure to the hazard by employing policies and procedures that reduce risk. Training is an example of an administrative control that increases “workers” knowledge of a hazard.

American Conference of Governmental Industrial Hygienists (ACGIH) – A scientific organization that develops occupational exposure limits for chemical and physical hazards. These limits can be found in their TLVs® and BEIs® book which is published annually. <https://www.acgih.org>

Amplitude – The intensity or perceived loudness of sound which is measured in decibels (dB).

American National Standards Association (ANIS) – A private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system. Founded in 1918, the Institute works in close collaboration with stakeholders from industry and government to identify and develop standards- and conformance-based solutions to national and global priorities.

Attenuation – The reduction in sound pressure at the ear because of a hearing protector, which can be estimated by measuring the change in hearing threshold level that results when a hearing protector is worn.

Attenuation class – A Canadian classification system for hearing protectors that specifies the attenuation in terms of a letter, A, B, or C, as determined by applying the requirements of CSA Z94.2-14 “Hearing protection devices - performances, selection, care and use”.

Audiogram – A graph or chart presenting the hearing threshold level as a function of frequency, that is measured with an audiometer.

Audiologist – A healthcare professional whose focus is on the evaluation of hearing and rehabilitation of patients with hearing impairment.

Audiometric technician – A person who conducts and records hearing tests.

Audiometric test – A test which measures a person’s ability to hear different frequencies of sound.

Baseline audiometric test – The first hearing test an individual has performed. The baseline audiometric test must be conducted within the first three months of employment. The test results should be used as a reference against which subsequent test results are compared.

Canadian Standards Association (CSA) – A standards organization which develops standards in 57 areas. CSA publishes standards in print and electronic form, and provides training and advisory services. CSA is composed of representatives from industry, government, and consumer groups. <https://store.csagroup.org>

Decibel (dB) – The unit of measurement used to express the amplitude of sound which is given on a logarithmic scale.

Dosimeter – An instrument designed to be worn by a worker in order to measure the wearer’s exposure to sound intensity or loudness.

Earmuff – A hearing protector consisting of a headband and ear cups which fits snugly against the outer ear and blocks the entrance of sound.

Earplug – A hearing protector worn inside the ear canal that blocks the entrance of noise into the ear canal.

Employer – A person who employs (or contracts the services of) one or more workers, including temporary workers.

Engineering controls – Controls that eliminate or reduce the hazard through the design of the workplace, equipment and tools. Common examples include modifying or replacing equipment, or making physical changes at the noise source or along the path of transmission to reduce the noise level at the worker's ear.

Frequency – The number of sound waves over a given period of time measured in Hertz (Hz).

Hearing conservation program – A occupational health and safety program designed to manage exposure to sound in the workplace. This program is required for all workplaces that include workers who are exposed to sound in excess of the occupational exposure limits.

Hearing conservation report – A summary of the number of workers who have had baseline and annual hearing tests, as well as, the number of tests that indicate a noise-induced shift in hearing when compared to a baseline test. This report is one of the most effective means of measuring the effectiveness of a hearing conservation program.

Hearing protection – A type of personal protective equipment, worn by a worker that reduces the intensity or loudness of sound entering wears ears.

Hertz (Hz) – The unit of measurement used to express the frequency of sound pressure waves over a period of time.

Integrating sound level meter – A device used to measure sound intensity or loudness over a period of time.

l'Institut de recherche Robert-Sauvé en santé et en sécurité du travail (IRRSST) – One of the leading OHS research centres in Canada, the IRSST conducts and funds research activities aimed at eliminating risks to worker health and safety and at promoting worker rehabilitation.

Leq – The equivalent A-weighted sound level during the time period T, using a 3 dB exchange rate.

National Institute for Occupational Safety and Health (NIOSH) – A national agency responsible for conducting research and making recommendations for the prevention of work-related illnesses and injuries

Noise-induced hearing loss (NIHL) – A preventable hearing disorder resulting from exposure to high-noise levels over a long period of time.

Noise reduction rating (NRR) – A U.S. rating system for hearing protectors that indicates the attenuation provided using a numerical system, assuming it is worn properly.

Personal protective equipment (PPE) – Any equipment or device which protects a worker's body from injury, illness or death.

Qualified person – A person who is knowledgeable of the work, the hazards involved and the means to control the hazards, by reason of education, training, experience or a combination of them.

Threshold limit value (TLV) – Conditions set by the ACGIH under which it is believed that nearly all workers may be repeatedly exposed, day after day, over a working lifetime, without adverse health effects.

Tinnitus – The perception of ringing or other noises in one or both ears in the absence of an actual sound.

Time weighted average (TWA) – The amount for a conventional 8 hour workday and 40 hour work week, to which it is believed that nearly all workers may be repeatedly exposed day after day, over a working lifetime, without adverse health effects.

12.0 Appendix B - Program Evaluation Checklist

The following is an example of a program evaluation checklist that can be used to determine if your HCP meets the current legislation and standards.

It is recommended that the results of the program evaluation be made available to the Occupational Health and Safety Committee, Worker Health and Safety Representative or Designate, and the program administrator, if applicable.

Item	Yes/No	If No, list required actions and responsible party
Is the legislation used to write this HCP current?		
Is the most current version of CSA Z107.56 "Measurement of noise exposure" used to write this HCP?		
Are the roles and responsibilities of the employer, supervisors and workers included in the HCP, and do they meet the legislation and standards?		
Has a noise assessment of the workplace been conducted by a qualified person to identify high-noise areas and tasks in accordance with CSA Z107.56?		
Has personal exposure of workers (or similar exposure groups) been measured?		
Is a report of the findings of the noise risk assessment available to workers?		
Have major sources of noise been identified?		
Where practicable, are major sources of noises eliminated or the noise reduced?		
Do preventative maintenance plans exist for controls used to reduce noise at the source, if applicable?		
Are warning signs posted on entrance to work area where hearing protection is required?		
Is hearing protection used where required?		
Is hearing protection selected in accordance with CSA Standard Z94.2?		
Are hearing protection devices inspected, cleaned, maintained and stored according to the manufacturer's guidance?		

<p>Have workers received training which includes:</p> <ul style="list-style-type: none"> • The health effects of overexposure to noise; • The fitting, inspection, maintenance, care and use of hearing protection; • The purpose of hearing tests; and • Their responsibilities as outlined by the HCP? 		
<p>Are hearing tests provided to new workers within the first three months of starting employment?</p>		
<p>Are hearing test provided on an annual basis or earlier, when recommended by an audiologist or occupational physician?</p>		
<p>Are hearing test results maintained in a confidential manner by the employer?</p>		
<p>Are the results of hearing tests (e.g. the hearing conservation report) reviewed to determine if the HCP is effective?</p>		

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St. John's Office

146-148 Forest Road, P.O. Box 9000, St. John's, NL A1A 3B8

t 709.778.1000 f 709.738.1714 t 1.800.563.9000

Grand Falls-Windsor Office

26 High Street, P.O. Box 850, Grand Falls-Windsor, NL A2A 2P7

t 709.489.1600 f 709.489.1616 t 1.800.563.3448

Corner Brook Office

Suite 201B, Millbrook Mall, 2 Herald Avenue, P.O. Box 474, Corner Brook, NL A2H 6E6

t 709.637.2700 f 709.639.1018 t 1.800.563.2772

email: info@workplacenl.ca

workplacenl.ca