

August 10, 2006

I am writing to you in order to follow-up on my letter of November, 2005, regarding the unacceptable number of serious injuries and fatalities in British Columbia's forestry sector. In that letter, I summarized the occupational health and safety ("OHS") responsibilities of all stakeholders in the forest industry, and I described the consequences – including financial penalties and possible criminal prosecution – for non-compliance with OHS law.

I advised that WorkSafeBC would begin an intensive assessment and examination of each workplace party during workplace inspections, and determine the extent to which each workplace party was fulfilling their legal duties. In January 2006, we initiated a 3-month pilot project where 38 forestry prevention officers spent considerable time at each worksite inspection recording detailed information and carefully examining the compliance activities of every workplace party. The information from this pilot project was assembled and analyzed, and the preliminary results indicate that there remain significant challenges in reaching our collective goal of safe and healthy forestry workplaces.

During the pilot project, WorkSafeBC inspected over 300 worksites and issued over 600 compliance orders for violations of the *Workers Compensation Act* and the *Occupational Health and Safety Regulation*. During those inspections, we discovered the following information that may assist you in evaluating your approach to safety in BC's forests:

Planning for forestry operations

- The licensee was the owner of the workplace for health and safety purposes at 70% of the worksites.
- Only half of all owners reviewed the health and safety program of prime contractors.
- Only 30% of prime contractors reviewed the health and safety programs of sub-contractors.
- In only 37% of the cases was a contractor's previous compliance history considered prior to awarding the contract (while this is not a legal requirement, it is considered to be good practice).

Training

- At only half of the worksites was a review of current safe work procedures conducted on a regular basis before start-up of work.
- Only one-third of worksites had a record of supervisor training applicable to the work being supervised.
- Workers were instructed in emergency response and participated in safety drills at only half of the worksites inspected.

Supervision

- A written job description, including duties for supervisors, was present at only half of all worksites.
- Only one-third of all supervisors received training specific to the work they were conducting.
- One-quarter of worksites did not have designated supervisors.
- Supervisors were not held accountable for effective supervision at 30% of worksites.

This finding confirms that, to date, many workplace parties are failing to fulfill their legal obligations. This places workers at unnecessary health and safety risks, and exposes negligent workplace parties to significant legal and financial consequences.

You have a legal obligation under Division 3, Part 3, of the *Workers Compensation Act* to ensure you are in compliance with all your OHS responsibilities, including those specific rules regarding planning, training and supervision for forestry operations.

The results from our pilot project can be reviewed on our website at:

<http://www2.worksafebc.com/Portals/Forestry/Home.asp>

WorkSafeBC will continue to focus our efforts to ensure that all forestry workplace parties are meeting their occupational health and safety responsibilities. Each order written during the pilot project will be followed up in the near future, and continued non-compliance will lead to financial penalties and consideration for prosecution.

Although the number of fatalities is lower this year than last, this provides little consolation to the families who have lost their loved ones at the workplace since January 2006.

I encourage you to evaluate your firm's efforts to comply with British Columbia's occupational health and safety law, in order to ensure that all workers return home at the end of every working day.

Yours truly,

A handwritten signature in black ink, appearing to read 'Douglas J. Enns', with a stylized flourish at the end.

Douglas J. Enns, FCA, C.Dir.
Chair, Board of Directors