



2005 October 31

WorkSafeBC  
Policy & Research Division  
PO Box 5350 Station Terminal  
Vancouver, BC V6B 5L5

Dear Sir/Madam:

**Re: WCB Review of Part 3, Rights and Responsibilities – Occupational Health & Safety Programs, Section 3.1 – When are they Required**

Thank you for the opportunity to comment on the above area of review. Given our general support for the changes, it is not our intention to speak to them at the Public Hearing scheduled for 2005 November 03.

Our comments and recommendations are as follows:

### **Overview**

In general, we consider and interpret the proposed changes to be either neutral, technological updates, or improvements over the existing WCB Regulation.

### **Part 3 Occupational Health and Safety Programs**

**3.1** The change removes redundant wording. We support the change.

### **Part 6 Substance Specific Requirements**

The change allows other acceptable methods for testing for asbestos fibres. It allows for changes in scientific methods. The change recognizes that the WCB no longer has a testing laboratory.

**6.44 and 6.48** The changes are to minor wording concerning cytotoxic drugs with little or no impact on our operations. We support the changes.

### **Part 8 Respirators**

These changes are in recognition that workers other than firefighters may use respirators.

#### **Human Resources Division**

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We understand the changes would update the CSA standard from 1993 to the 2002 version. This updates the technical requirements for respirators. We support the changes.

As we understand it, the reference to the CSA standard which applies to SCBA in Reg. 8.37 is updated from the 1985 edition to the 2000 standard. (CSA standards are reviewed and revised at various times for different items or issues.)

The new standard requires that if the air in a SCBA cylinder has not been used for a period in excess of one year, the cylinder must be slowly depressurized and refilled according to the standard.

The fit test must be carried out at least once per year.

We support the changes as we have already implemented them.

### **Part 11 Fall Protection**

We understand that the changes under:

**11.6** clarifies that each lifeline or lanyard must be connected to an independent point of anchorage. In short, two workers cannot tie off to the same anchor.

The change also clarifies that the requirements apply equally to fall restraint and fall arrest systems.

We support the changes.

**11.7** The change deletes the requirements for drawings from manufacturers for temporary horizontal lifelines – recognizing that these may not exist and, in any case, present an impractical requirement.

We support the changes.

### **Part 12 Tools, Machinery and Equipment**

As we understand it, these changes under:

12.74 (2) in light of the reduced language and clarifications in this section we suggest the addition of a definition in Section 12.1 using language from ANSI/ALI

ALOIM-2000 describing portable automotive lifting systems including shop crane, jack, axle stands, ramps or other vehicle supports to eliminate confusion.

- 12.80** updates the ANSI standard to the current versions and that the standard is developed by the manufacturers and by certain suppliers of automotive lifts in the US and Canada.
- 13.33** The change clarifies which is common practice – that a permanent anchor point must have an ultimate load capacity of 5000 pounds.

We support the changes as the city has implemented these or a higher standard of care.

### **Part 13 Ladders, Scaffolds and Temporary Work Platforms**

- 13.29** This affects lower limit travel devices for cranes in order to prevent them from going beyond safe limits. If they are not practicable, then safe work procedures must be used.

We support the changes with little or no impact on our operations.

### **Part 14 Cranes & Hoists**

This is a consequential amendment related to **13.29** above and has been repealed.

We support the change with little or no impact on our operations.

### **Part 20 Construction, Excavation and Demolition**

- 20.13** This concerns thrust out crane landing platforms and replaces the requirement that the WCB give prior approval to any potential overload and requires control measures to ensure that platforms are not over-loaded. (Cranes are much bigger now so the load can easily be exceeded if control measures are not in place.)
- 20.101** The change permits, within certain criteria, the use of a secondary hoisting line on a crane to suspend workers on a work platform if no other means of accomplishing the work can be found and if this can be done safely.

We support these changes with little or no impact on our operations.

**Part 26 Forestry Operations**

**26.65** This concerns the width of the barrier that protects drivers at the back of a logging truck.

We support the change with little or no impact on our operations.

**Part 31 Firefighting**

**31.46** This recognizes that new fit testing methods have been developed and permits their use. The proposal is that CSA standard from 1993 be replaced with the 2002 version to recognize changes in technology.

Fit testing must be done annually, or wherever there is a change to the respirator face-piece.

We support the change as the city has implemented these or a higher standard of care.

Once again, we would like to thank you for consulting with us.

Yours truly,



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