

Your submission has been received.

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Submission ID: P08.406.LG2.71Y

Part 13, Section 13.33

Sector: 7210 - Construction, General Construction

Name: Allan R. Luck

Title: Owner/Operator

Type: Health & Safety Consultant

Organization: A.R. Luck & Associates Ltd

Submission:

The terminology "scissor-lift or platform with similar operating characteristics" is so open-ended. Does that mean that the platform can only go up and down in a single plane or, does it mean that it has to have scissor-like components or, does it mean any platform that is not attached to a boom? If a client should ask for a definition, what would you like me to tell them?

Q: The proposed change is easy to understand

A: Neutral

Q: The reasons given in the explanatory notes to support this change are relevant

A: Neutral

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Neutral

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Neutral

Q: I support the proposal

A: Agree

Q: I will participate in the regulatory review on-line process in future

A: Agree  
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Your submission has been received.

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Submission ID: P08.406.KN2.X8X

Part 14, Section 14.91

Sector: 7210 - Construction, General Construction

Name: Allan R. Luck

Title: Owner/Operator

Type: Health & Safety Consultant

Organization: A.R. Luck & Associates Ltd

Submission:

You have removed a 500-hour requirement for clearly demonstrable and defensible reasons. There is now no requirement for 14-strand or plastic-core wire rope. Is there no guideline that can be used to mandate attention to these two new types of rope? Use could go on indefinitely without some guide.

Q: The proposed change is easy to understand

A: Agree

Q: The reasons given in the explanatory notes to support this change are relevant

A: Agree

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Neutral

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Neutral

Q: I support the proposal

A: Agree

Q: I will participate in the regulatory review on-line process in future

A: Agree  
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Your submission has been received.

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Submission ID: P08.406.K62.CNX

Part 18, Sections 18.1 etc.

Sector: 7210 - Construction, General Construction

Name: Allan R. Luck

Title: Owner/Operator

Type: Health & Safety Consultant

Organization: A.R. Luck & Associates Ltd

Submission:

1) Amendment 18.4(1)(c) speaks to qualification. Employers assume that graduates of the assorted training programs are "qualified" (otherwise, why send someone to the training program). Having spoken to several attendees, I have my serious doubts. Several attendees indicated to me that "nobody fails". People achieve a "pass mark" by manipulation of the quiz (by the instructor). Check your pass/fail figures against number of attendees. You have people out there who could not pass a separate on-the-spot administered challenge test (have your officers try it).

2) Traffic control persons tend to shed clothing in the summer time. What is the WCB position on shorts and t-shirts? What do you expect traffic control people to do with the requirement in 18.9 for wrist and ankle bands (when there is nothing to attache such band to)?

Q: The proposed change is easy to understand

A: Agree

Q: The reasons given in the explanatory notes to support this change are relevant

A: Agree

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Neutral

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Neutral

Q: I support the proposal

A: Neutral

Q: I will participate in the regulatory review on-line process in future

A: Agree  
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Your submission has been received.

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Submission ID: P08.406.J32.MB2

Part 20, Section 20.4 etc.

Sector: 7210 - Construction, General Construction

Name: Allan R. Luck

Title: Owner/Operator

Type: Health & Safety Consultant

Organization: A.R. Luck & Associates Ltd

Submission:

1) Many of the arguments on site relate to the suppliers of materials not wishing to complete the delivery where it is not convenient to do so. Access may be a "red herring". The WCB may be being used to make delivery "easy" for the supplier (where there is really no issue).

2) General Contractors have little to no control over the access equipment brought to the site by a supplier/delivery person. Surely, the issue of coordination (or, even "control" via systems) cannot reasonably be extended beyond the capability of a Site Contractor to superintend. The WCB needs to become aggressive with the companies in the materials supply business (to make sure that they use proper and, properly maintained, equipment).

3) Interior finishing (when gyproc-type materials are being provided) is toward the final stage of construction. Leaving accessways open in the side of buildings or preventing wiring or plumbing from being installed until finishing materials are loaded in may not be practicable.

Q: The proposed change is easy to understand

A: Agree

Q: The reasons given in the explanatory notes to support this change are relevant

A: Neutral

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Neutral

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Neutral

Q: I support the proposal

A: Disagree

Q: I will participate in the regulatory review on-line process in future

A: Agree  
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