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WorkSafeBC
OHS Regulation Review
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Attention: Review Administrator

My submission is on behalf of the Applied Science Technologists and Technicians of British Columbia (ASTTBC).

Whereas we fully support WorkSafeBC's most recent revision eliminating the "manufacturer's recommendation" provisions, a point became apparent during the review. In various Parts of the Regulations (Appendix I), it stipulates that any review or acceptance of a change must be certified or specified solely by a professional engineer. We are petitioning WorkSafeBC to revise that condition to include technologists registered with our professional organization.

The ASTTBC has worked alongside the Association of Professional Engineers and Geoscientists of British Columbia (APEGBC) for some time. We appreciate the capabilities and dedication of that organization particularly where work involves original design or first principles. However, for repairs or modifications to original designs, or off-the-shelf supply, the applications and training of technologists come fully into play.

As technologists are already performing much of this work with British Columbia, we wish to be recognized through inclusion within the OHS Regulations.

Yours truly,

Malcolm N. MacIntosh, AScT

Appendix I

Sections of the Regulations

Part Number	General Conditions Description
4.3 (2) (b)	Buildings, Structures and Equipment
12.21 (3)	Tools, Machinery and Equipment
20.22 (1)	Construction, Excavation and Demolition
20.66 (5)	Construction, Excavation and Demolition
20.85 (1)	Construction, Excavation and Demolition
22.130 (2)	Underground Workings
23.16 (1)	Oil and Gas – Pressure Relief Device
26.33 (1)	Forestry Operations – Yarding and Skidding