



CORPORATION OF THE CITY OF NEW WESTMINSTER

2006 June 2

VIA EMAIL

Ms. Anne Birch, Director
Policy and Research Division
WorkSafeBC
PO Box 5350 Station Terminal
Vancouver, BC
V6B 5L5

Dear Ms. Birch:

Re: Proposed Amendments to Occupational Health and Safety Regulations

On behalf of the City of New Westminster, I am writing to express our concerns and comments with respect to the proposed amendments to the Occupational Health and Safety Regulations.

Section 4.3 – Safe Machinery and Equipment

We support the proposed changes to Section 4.3 as it stresses safe practices over the requirement to follow the manufacturers' recommendations.

Section 5.49 – Excursion Limits

The proposed amendments appear to correct what were often contradictory exposure limits and therefore we support this amendment.

Section 9.11 – Qualifications

We agree with this amendment as it requires that a "qualified person" have both the training and pertinent experience.

Section 9.18 – Isolation

We support this amendment as the distinction between pressures that exceed 15 psig and those that do not exceed 15 psig is not distinguishable.

Section 9.22 – Alternate Procedures

We support the amendments to this section as it provides for additional flexibility in meeting the measures defined in this section.

Section 13.33 – Fall Protection

We support the changes to this section as they are sensible and practicable.

Section 18.1 – Traffic Control Manual

Section 18.5 – Traffic Control Persons

Section 18.6 – Selection and Instruction

We generally support the suggested amendments which have been made in the above noted sections.

Section 18.3 – Traffic Control Supervisor

We do **not** support the amendments to this section as the amendments would require a two day course approved by WorkSafeBC prior to having an employer assign a worker to traffic control. This may be acceptable in high hazard situations but is certainly not necessary for assignments of short duration or assignments on back streets and lanes. We would prefer to identify the hazard and train our employees accordingly.

Thank you for the opportunity to comment on the proposed amendments to the Occupational Health and Safety Regulations.

Yours sincerely,



Allan Woodbury
Director of Human Resources

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