



EMIL ANDERSON CONSTRUCTION (EAC) INC.

May 18, 2006

Ms. Ann Burch  
Director, Policy and Review Section  
WorkSafeBC

Via Email: [anneburch1@worksafebc.com](mailto:anneburch1@worksafebc.com)

Dear Ms. Burch,

We have completed our review of the proposed Regulation changes currently at Public Hearing. We are perplexed with one proposed change – the Traffic Control Person's training requirement. This appears to be a complete reversal from the 2005 proposition.

**We strongly object to this change.** The previous proposal in December 2005, established a “qualified worker” status regarding a traffic control person. That proposal was an important addition due to the deaths occurring on highways to these persons.

The 2005 proposal also recognized that there could be at least two categories of traffic control situations evident in the workplace: **High and Low Hazard**, and that the employer should be provided the flexibility of training the worker in the **Low Hazard** situation. The former proposal recognized that a range of hazard levels exist while directing traffic.

The current proposed regulation has the effect of forcing contractors such as ourselves, to take a **WorkSafeBC** approved course, and does not clearly distinguish between High and Low Hazard situations, and no longer permits an affected contractor to do the training. Instead we must send an employee to a **WorkSafeBC** approved course.

In our view, the current proposal will result in **WorkSafeBC** being deluged with applications for course approvals. This is not a productive use of my premium funds, my employees' time, nor **WorkSafeBC** staff time and resources.

This proposed regulation should be changed to allow employers the flexibility to train employees for Low Hazard traffic control situations – as we do now for other unrelated workplace scenarios involving fall protection, excavation work and confined space work.

**This section should not proceed as written.** The lower level traffic control training requirements should be restored as contained in the 2005 proposition. We should be provided with the flexibility to train as appropriate, without seeking **WorkSafeBC** approval for the course in advance.

Yours truly,

**EMIL ANDERSON CONSTRUCTION (EAC) INC.**

A handwritten signature in blue ink, appearing to read 'R. J. Hasell', is written over the company name.

R. J. Hasell, P.Eng.  
Chief Executive Officer

RJH/jm

Cc: Roberta Ellis, Vice President, WorkSafeBC Policy & Research Division  
(Via Email: [roberta.ellis@worksafebc.com](mailto:roberta.ellis@worksafebc.com))