

June 5, 2006

Doug Enns, Chair
WorksafeBC
P.O. Box 5350, Stn. Terminal
Richmond, BC V6B 5L5

Dear Doug:

I am writing to outline ICBA's concerns regarding the proposed crane regulations.

ICBA fully supports the introduction of regulations that address the competence of crane operators. A number of individuals and groups have been working on a new regulatory system and they should be commended for their efforts. Although ICBA has been excluded from the organization charged with the development of the new regime we have been kept apprised of its progress and our input has been sought.

However, before the new regulatory system is introduced into the BC construction industry a number of operational issues must be addressed and it is for this reason we are asking that WorksafeBC **postpone** enacting regulatory changes related to cranes.

Cost of new regulatory regime

There does not seem to be any sort of business plan in place to determine the cost of implementing the certification of crane operators. There are approximately 6,000 current employees needing to be certified. The approach being suggested is that inspectors will be hired throughout the province to administer competency tests. That is a very expensive approach yet no financial analysis has been done. Clearly, implementing a significant change in the regulations without fully understanding the financial ramifications is not a prudent way to operate.

Who will do the testing

It is not clear how many inspectors will be required, what qualifications they will need and from where they will be recruited. This is a very busy time for our industry and skilled crane operators, as with all trades, are in short supply.

Transition Issues

There does not appear to be a plan to transition the industry into the new regulatory environment. ICBA suggests that a phased implementation plan be developed. For example, start with certifying all tower crane operators followed by all boom truck operators, etc.

The introduction of crane regulations will impact thousands of individuals and businesses inside and outside of the construction industry. It is a big change that will be introduced at one of the busiest times in the history of our province. WorksafeBC should not proceed until a thorough due diligence process has been completed. Until a business plan is in place that includes an assessment of the costs and who will bear those costs, an implementation strategy and a communication strategy that due diligence process has not been completed. To change the regulatory environment now and then complete the due diligence process can best be characterized as "ready, fire, aim"!

Again, ICBA fully supports competency testing of crane operators and we are willing to help achieve that goal.

Yours truly,

A handwritten signature in black ink, appearing to read "Philip Hochstein". The signature is fluid and cursive, written in a professional style.

Philip Hochstein
President

cc. David Anderson
Jim Barkman
Don Nelson
Fraser Cocks
Doug Alley
Construction Safety Network