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Ms. Anne Burch  
Director, Policy and Review Division

WorkSafe, BC

April 20, 2006

RE: Proposed changes to WorkSafe Regulations.

Dear Ms. Burch,

We are a large construction firm in Victoria and we have some concerns regarding the stringent rules you will be implementing in the Part 14 Section 14.34 Cranes and Hoists and Part 18 Traffic Control.

Pertaining to the former section on Cranes and hoists we would like you to consider the circumstances we found ourselves in when we attempted to begin work on the "Shutters" project. We initially hired Canadian crane operators and had difficulty both keeping workers and with the work ethic exhibited by those people we hired. In an industry that is market driven and with the lack of availability of experienced crane operators we would caution you not to exclude foreign workers. This then relates to the issue of your making a predetermination of the "Agency Acceptable to the Board" a condition of employment. How will you ascertain what agencies abroad are "acceptable to the board"?

Secondly, for traffic control the current proposal does not clearly distinguish between low and high hazard situations and it no longer permits the employer to do the training. An employer should not have to incur additional costs to train a person in a skill that is job site specific. As can be seen with any form of training some people do well with course work and others are "hands on learners". A number of people who are well suited to this form of work will be eliminated from

this job type. An employer who is capable of large project based work should be able to adequately assess their personal and the suitability of a person to work in either low or high-risk traffic control. Industry costs are already at an all time high and it behooves the government and institutions such as yours to realize the fault to implementing this kind of program. It is our estimation that this is a needless, inefficient cost prohibitive program. If BC truly is on the side of business and in particular small business, then somewhere the institutionalization of every aspect of business practice must be reasonable and justifiable. For example how many people in traffic control are there working and how many of those have been injured in this capacity or died?

It is only common sense to make an industry change if statistics warrant it.

Regards,



Vern Fischer  
250-380-2231 Extension 1

c Minister of Labour, Honourable Joe Fontana  
Premier of BC, Honourable Gordon Campbell  
Maurine Karagianis, MLA Esquimalt - Metchosin  
Construction Association of Victoria