

Ms. Anne Burch
Director, Policy and Review Division
WorkSafeBC
BY email: anne.burch@worksafebc.com
cc Roberta Ellis, Vice President, Policy and Research Division
roberta.ellis@worksafebc.com

Dear Ms. Burch:

Thank you for the opportunity to offer comments on the proposed changes to the Occupational Health & Safety Regulation on Traffic Control (Part 18).

We believe that the Regulation, as it is proposed, will not meet the safety needs of the Construction Industry.

We agree that there should be a recognition of two levels of hazard when traffic must be managed around a construction site.

The proposed Regulation recognizes that there are higher and lower levels of exposure to hazards in Traffic Control.

However, we disagree with the proposed requirement for the lower level hazard that would force employers to send the Traffic Control Person to some designed course, so that the worker would be “trained in a course acceptable to the Board”.

We believe that the employer should have the ability to determine the most appropriate kind of training, to meet the needs of the situation.

We recommend that the wording of the Regulation be changed to require that the worker be “trained in a manner acceptable to the Board”.

This change would harmonize the TCP Regulation with the other WorkSafeBC Regulations – in that they require adequate training as opposed to a specific, Board-approved course.

There is also a general Regulation which requires that the employer provide "instruction and supervision of workers in the safe performance of their work."[(OHSR 3.3(g)]

Thank you for conducting this consultation process.

Don Schouten

Ellis, Roberta

From: Don Schouten
Sent: Thursday, May 25, 2006 1:55 PM
To: Burch, Anne
Cc: Ellis, Roberta
Subject: Proposed Change To Regulation On Traffic Control
Attachments: Reg Hearing 2006.doc

Dear Ms. Burch

Attached please find my letter which comments on the proposed change to the Occupational Health & Safety Regulation on Traffic Control (Part 18).

Thank you for the opportunity to express my view on this issue.

Regards;

Don Schouten

2006/05/25