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Workers' Compensation Board of British Columbia  
Prevention Policy & Regulation Review Department  
Policy and Research Division  
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**Via Email: [Regquery@worksafebc.com](mailto:Regquery@worksafebc.com)**

Attn.: Prevention Policy & Regulation Review Department

**RE: FEEDBACK ON PROPOSED WORKSAFE BC  
REGULATION CHANGES REGARDING  
TRAINING OF NEW/YOUNG WORKERS**

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To Whom It May Concern:

We are writing to offer our voice to the public discussion around the proposed amendments to Part 3 of the Rights and Responsibilities of Young or New Workers in the Occupational Health and Safety Regulation. In particular, we'd like to address the proposed addition of new assessment/documentation of training requirements within the 6-month period following a new workers date of hire.

As an employer we take safety seriously because of the numerous hazards associated with our industry. Given that our labour pool is constantly changing, it behooves us to ensure our workers are well trained and are well informed of job hazards. To not do so would cost us considerably in terms of increases to our experience rating. As such we support the training/orientation of new and young workers. The documentation of this initial training also makes sense from a best practices perspective in that it requires an element of due diligence on our part and the part of our employees who deliver the training.

However, we oppose the assumption that additional written assessment and documentation of training during the first six months of a worker's employment (which, in our industry, often isn't as long as 6 months), will result in significant injury reduction (the assumed payoff for workers and ourselves). In fact, we understand that, *without* the proposed change (or additional paperwork), the overall injury rate for young workers has been *declining* since 1996.

Furthermore, while we believe that employers benefit from ongoing safety focus and training for all of their workers, we are not aware of any evidence that the *additional assessment/documentation of training* will lead to significant reductions in these injuries for young workers. Although we do not disagree that young workers are prone to a greater number of serious injuries in general, we do not believe that the 'fix' will be requiring employers to spend additional money to provide further assessment and documentation which, in many firms' cases, will not even be monitored/policed by your organization. We believe our continuing focus on safety will go further than to implement this proposal.

Perhaps the WCB *has* allocated additional funds for enforcing this new policy and the intention is *not* just to dump the costs for this assumed 'solution' onto the backs of employers. We believe, though, that any such 'enforcement' money would be better spent supporting centralized, uniformly delivered training programs for new workers such as the Certificate of Recognition Program implemented by the Construction Safety Association of BC in conjunction with WCB and similar types of programs offered by many apprenticeship programs as part of their completion requirements. The end results would be a better payoff for all of us: a more uniformly trained work force tied to industry certification with a more equitable distribution of costs.

Yours truly,  
**ALLIED BLOWER & SHEET METAL LTD.**

**Barrie Forbes**

BF/ss