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**Complete HVACR
Services & Installations - Commercial & Industrial**

Workers' Compensation Board of BC
Prevention Policy & Regulation Review Dept.
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver, BC, V6B 5L5.

Nov 27, 2006

Re : Proposed WorkSafeBC Regulation Change

Attention : Policy & Research Division

Please accept this letter as our recommendation to the below stated changes.

1. We support the training of new and young workers. This is necessary if these workers are to understand the hazards of the job and learn to control them.
2. We support the documentation of this initial training. This provides an element of Due Diligence – proof that the training has been done.
3. **We oppose the excessive requirement of the written assessment and documentation of the new or young worker's safety performance every two months for the first six months. This is an unreasonable level of paperwork that would probably not be done and would create a bureaucratic nightmare of enforcement.**

The ongoing assessment of a new or young worker is not practical in an industry where change is the only constant. There is so much movement and change of location/job/activity within the 180,000 workers in construction that there would be continuous and non-stop requirements for assessments. The construction workforce is highly mobile. An employer with 20 full time positions may actually have as many 80 workers cycle through those positions in one year.

Our workforce may be composed of labour contract workers, who are very short term. The Construction Industry has already taken the initiative on new and young workers. The Construction Safety Association of BC – in cooperation with WorkSafeBC -- offers a Certificate of Recognition program. The CSABC program includes interactive, computer-based worker training. The 12 elements of this training program include the proposed requirements for training. The computer-based training also provides built-in verification and documentation. CSABC offers this program, through its regional partners, to all regions of BC

Yours Truly,

Robert Arcand
President

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