

November 22, 2006

Ms. Anne Burch  
Director, Prevention Policy & Regulation Review Department  
Policy and Research Division  
WorkSafeBC

Dear Anne:

I am writing on behalf of the B.C. Floor Covering Association with respect to the proposed new WorkSafeBC regulation which deals with the training of new and young workers.

BCFCA supports the training of new and young workers and training is essential if these workers are to understand the hazards of the job and learn to eliminate or control them. In fact, BCFCA is a member of COCA the organization that initiated the Construction Safety Association of BC in cooperation with WorkSafeBC. Please refer to [www.COCTA.org](http://www.COCTA.org) for more information.

CSABC offers a Certificate of Recognition program which is delivered through our regional partners and which provides a high quality, consistent training program specifically designed to safeguard the worker on construction sites.

The CSABC program includes interactive, computer-based worker training which is directly focused on the new and young worker. The 12 elements of this training program include requirements for training as proposed in the WorkSafeBC Draft regulation. The computer-based training also provides built-in verification and documentation. CSABC offers this program as part of a strategy that includes training for company owners and supervisors.

While we support the Draft regulation 3.22 to 3.24, we strongly oppose the additional Draft regulation (3.25 to 3.26) which would require a company to assess the safety performance of a young worker every two months for the first six months of that worker's job.

This requirement would affect every worker age 24 or younger each time there is a change to the hazards in the workplace or each time the worker changes locations.

For the Construction Industry, this would mean an endless cycle of written documentation and record keeping. Construction workers have a high turnover rate of employees. It is common for a company with a Full Time Equivalent of 20 workers to have 60 or more individuals come and go in the course of one year. Many of these workers are under 25 years of age. The workers also move from one area to another within the construction project.

And the construction project itself is continually changing as the project is constructed, demolished or renovated.

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.

**Summary**

- We support the specified training for new and young workers as well as the documentation of this initial training. This provides an element of Due Diligence – proof that the training has been done.
- 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.

We look forward to your response.

Sincerely,

Gay Woodward, CAE  
Executive Director, BCFCA

pc: Grant McMillan, COCA  
COCTA members